

This report needs to be read in conjunction with the Decision Notice.

DATE INSPECTED:

Ribble Valley Borough Council

DELEGATED ITEM FILE REPORT - APPROVAL

Ref: AD/EL

Application No:

3/2014/1022/P

Development Proposed:

Internal works at 58 Church Street, Ribchester

CONSULTATIONS: Parish/Town Council

Parish Council – The building is currently unoccupied and there is water ingress around the chimney. The two applications cover proposed repairs necessary to return the property back to a standard where it can be occupied. As this long running saga requires urgent resolution, the Parish Council raises no objection to either application.

However, the sad history of the case reinforces the Council's belief that much more should be done to alert new owners to the constraints imposed by listed building and conservation area status. The Parish Council has sought to bring this forward on a number of occasions, most recently in an article written for the Council's winter newsletter, a document that is circulated to every household in the Parish. A copy of this article is attached for information:

"Before any consideration of the issues it is worth posing to consider the comments of a Government Planning Inspector made some two years ago during a planning appeal.

'Ribchester is an attractive village with Roman and pre-Roman antecedents. Church Street, at the village heart, leads down to the bank of the River Ribble and is characterised by terraces of modest houses. Typically they are built of stone with slate roofs and although some have been marred by the incorporation of unsuitable modern features they still form a harmonious and attractive whole. While, in the older part of Church Street, dormer windows and some roof lights are untypical of the roofscape the character of Church Street has still not been seriously eroded'.

Much of this change can be laid at the lack of a coherent management plan for the Conservation Area that has been apparent for some time. Over the years in Ribchester, the conservation concept has often been honoured in the breach rather than enforced. As a consequence there has been a steady loss of architectural detail on properties, one of the principal weaknesses of the conservation area recognized in the 2006 Conservation Appraisal by the Conservation Studio.

The Parish Council supports the principle of the conservation area. It firmly believes that it should be protected or indeed enhanced. But in so doing acknowledges that this laudable ambition brings with it an issue of general concern –the lack of general guidance. It seems reasonable for property owners to have available a document that sets out the reasons why we have a Conservation Area, what it is meant to achieve and how the Borough Council seeks to protect it. Without such advice owners can be left very much in the dark and may, possibly through ignorance of the 'rules', ignore restrictions on development. New owners are particularly vulnerable to this, as they may well have moved to the area unaware of its history.

The Parish Council has pressed for this for some time, while seeking to avoid provoking an over reaction by the Borough Council. Gentle guidance for the future is perhaps what is required. The report by the Conservation Studio in 2006 could have provided a platform and might yet be able to do so. Adopting – and more importantly- publishing guidance would

assist owners to avoid issues that regularly come to the fore.

A plan of the Conservation Area together with published advice from the 'Conservation Appraisal' can be found on the Borough Council website".

CONSULTATIONS: Highway/Water Authority/Other Bodies

English Heritage – the grade II listed 58 Church Street is of significance for its Georgian design within a row of contemporary buildings in the Ribchester Conservation Area. The current listed building consent application is an amendment to a scheme English Heritage gave advice for in August 2014 and requests retrospective authorisation for unconsented works. English Heritage's previous advice advised that it was impossible to understand the impact of the scheme on the heritage asset as there was not enough information supporting the application. English Heritage are pleased to see this has been addressed and are now content that the proposals to rectify harm caused by the unauthorised works are acceptable. Subject to the agreement of the application with the RVBC conservation officer, English Heritage are content for the application to be approved.

If the householder wishes to do further works to their listed building, English Heritage recommend they take advice from the English Heritage website regarding common types of works to older houses.

Recommend that the above issues be addressed and that this application be determined in accordance with national and local policy guidance, and on the basis of RVBC expert conservation advice.

Historic amenity societies – Consulted, no representations received.

CONSULTATIONS: Additional Representations.

No representations have been received.

RELEVANT POLICIES:

Planning (Listed Buildings and Conservation Areas) Act 1990.

NPPF

NPPG

HEPPG

Policy DME4

Ribchester Conservation Area Appraisal.

COMMENTS/ENVIRONMENTAL/AONB/HUMAN RIGHTS ISSUES/RECOMMENDATION:

50-58 Church Street Ribchester is a Grade II listed (one entry in list; 22 November 1983), late C18 row of houses prominently sited within Ribchester Conservation Area. The list description identifies "*squared sandstone ... each house of one bay above is a plaque of '1795' (No. 56)*". Typically, the list description does not refer to building interiors. Whilst the row has obvious group value there is no evidence to suggest that this was the only reason for designation.

The immediate street scene includes the Grade II listed Nos. 8-15, Nos. 16-22, Nos. 23 and 24, Nos. 25 and 26 and Nos. 28 and 29 Church Street and a number of Buildings of Townscape Merit (Ribchester Conservation Area Appraisal - The Conservation Studio consultants; adopted by the Borough Council following public consultation 3 April 2007)

which make a positive contribution to the conservation area. No. 58 Church Street is within the setting of these buildings and the other properties within the row 50-58 Church Street.

English Heritage commented on 3/2014/0552 that:

"Key elements that add to the significance of the building include the Georgian design embodied in the proportions and details of the design; the craftsmanship and materials used; and the relationship between number 58, the rest of the row on Church Street and the Ribchester Conservation Area".

The Ribchester Conservation Area Appraisal identifies:

- (i) An Important View to pass along Church Street and in front of 58 Church Street;
- (ii) *Ribchester village is dominated by rows of handloom weavers' cottages, many of which were built in the late eighteenth century (Overview);*
- (iii) *The architectural and historic interest of the area's buildings, 21 of which are listed; Narrow, closely developed streets of former handloom weavers' settlement; Handloom weaver's cottages, including two with cellar loomshops, particularly in Church Street and Water Street; The prevalent use of local building stone (Summary of Special Interest);*
- (iv) *Ribchester's greatest period of expansion and prosperity was from the late eighteenth century, when rows of handloom weavers' cottages were built in Church Street and Water Street, transforming a small rural settlement into an industrial village (General Character and Plan Form);*
- (v) *The conservation area is primarily residential (Definition of the Special Interest of the Conservation Area: Activities/Uses);*
- (vi) *Ribchester has a high number of buildings surviving from the late eighteenth century, and some are probably rebuildings or alterations of earlier structures. It seems highly likely that Ribchester was substantially rebuilt from the later eighteenth century into the early nineteenth century corresponding with its growth as an industrial village and centre of handloom weaving. The survival of these buildings in Ribchester has retained a character that would have been shared by many of east Lancashire's textile towns around 1800. In these other settlements later expansion led to the replacement of earlier buildings which as a consequence of overcrowding were often regarded as slums. In Ribchester it is clear that these handloom weavers' cottages were well built for their period and a cause of pride as indicated by the numerous examples with initialled datestones.*

In keeping with many small provincial towns, the impact of Georgian building techniques was notable but also mixed with local building techniques and building customs continued to be used. Some of the cottages whilst being broadly vernacular in style have high quality classically inspired detailing on their sandstone door surrounds. As with many other towns where nineteenth century development was

limited, the physical environment retains a distinctive local individuality. Typically of such settlements, the status of the buildings and the occupants was mixed throughout and there was no development of specific class related areas. Overall, however, there is a high proportion of handloom weavers' cottages, built as two-up, two-down properties. Some had either first floor or ground floor weaving windows, but others had separate loomshops added to the rear of the buildings, or in the rear yards. Although the highest concentration of weavers' cottages is in Church Street and Water Street (Architectural and Historic Character);

- (vii) *The buildings of Ribchester were constructed mainly in Millstone Grit, with some fine grained sandstone used for decorative features, such as door and window surrounds. Stone flags and slate were used for roofing. In the late eighteenth and earlier nineteenth century most buildings were constructed using water-shot stone building techniques. Older buildings were rubble-faced, and later nineteenth century structures were built using pitch-faced stone blocks (Building Materials and Local Details);*
- (viii) *Insensitive alteration of historic buildings spoiling the conservation area's historic character and appearance (Weaknesses: the principle negative features of the Ribchester Conservation Area);*
- (ix) *Continuing loss of original architectural details and use of inappropriate modern materials or details. Many of the unlisted, and some of the listed, buildings in the conservation have been adversely affected by the use of inappropriate modern materials or details (Threats to the Ribchester Conservation Area).*

Relevant Planning History

3/2014/0552 - Internal works. LBC refused 12 August 2014.

3/2014/0553 - Cleaning of external stonework. LBC refused 12 August 2014.

3/2014/0569 - Replacement of existing windows and insertion of two conservation style velux windows. LBC refused 12 August 2014.

A public complaint (February 2014) alleging unauthorised works to the listed building is being investigated by the Borough Council. Uninvited retrospective applications were received (June 2014) in respect to 'Internal works' (3/2014/0552), 'Cleaning of external stonework' (3/2014/0553) and 'Replacement of existing windows and insertion of two conservation style velux windows' (3/2014/0569).

3/1988/0863 – Replacement windows. LBC granted 13 February 1989.

3/1977/0975 – Alterations and extensions. RVBC letter 9 November 1977 confirming works to be permitted development. Existing and proposed plan drawings do not suggest any existing or proposed access to the attic at this time.

Relevant Legislation, policy and guidance

Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that when considering applications for listed building consent, special regard shall be had to the

desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

Section 72 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that in the exercise of planning functions special attention shall be paid to the desirability of preserving or enhancing the character or appearance of a conservation area.

In respect to Sections 16, 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, the Governance and Legal Director of English Heritage ('Legal Developments' Conservation Bulletin Issue 71: Winter 2013) states that the courts have said that these statutory requirements operate as '*a paramount consideration*' and '*the first consideration for a decision maker*'.

The Governance and Legal Director of English Heritage ('Legal Developments' Conservation Bulletin Issue 73: Winter 2014) states in respect to (any level of) harm to a listed building:

"The Lyveden case reaffirmed that this means the conservation of a listed building should be afforded 'considerable weight and importance' ... with the 'great weight' of paragraph 132 and you should appreciate that minor harm does not mean merely a minor concern ... Any harm is to be given 'great weight' whether it is serious, substantial, moderate, minor or less than substantial ... every decision should acknowledge the general priority afforded to heritage conservation in comparison to other planning objectives or public benefits ... Minor harm to a heritage asset can add up to major and irreversible damage. It is obviously right that planning decisions reflect on this threat each and every time".

In respect to the Lyveden Court of Appeal decision, Gordon Nardell QC and Justine Thornton ('Turbines, heritage assets and merits', Local Government Lawyer, 24 April 2014) state:

"the key point is that once a decision-maker finds harm (to setting), there must be some express acknowledgement of the 'considerable' weight to be given, in the balance, to the desirability of avoiding that harm. It is not enough to ask in a general sense whether benefits outweigh harm, but whether they do so sufficiently to rebut the strong presumption against permission".

Consideration of 'less than substantial harm' is made in the Secretary of State's decision on Lane Head Farm, Cumbria (recovered appeal; decision 16 April 2014; paragraph 11) and Bythorn and Molesworth, Cambridgeshire (recovered appeal; decision 3 December 2014; paragraph 29): *"having regard to the judgment in the Barnwell Manor case, the Secretary of State takes the view that it does not follow that if the harm to heritage assets is found to be less than substantial, then the subsequent balancing exercise undertaken by the decision taker should ignore the overarching statutory duty imposed by section 66(1). He therefore sees a need to give considerable weight to the desirability of preserving the setting of all listed buildings"*.

Robin Purchas' QC recent judgement in **North Norfolk** is also noted *"inspector's approach seems to me at this level to have balanced the relative harm and benefit as a matter of straightforward planning judgement without that special regard required under the statute"* (paragraph 73).

J. Lindblom's recent judgment in **Forge Field** (12 June 2014) is also noted where it was held that having "special regard" or paying "special attention" involved more than merely giving weight to those matters in the planning balance: "preserving" in the context of s.66(1) and

s.72(1) meant doing no harm. There was a strong statutory presumption against granting planning permission for any development which would fail to preserve a listed building's setting or a conservation area's character or appearance. A local authority was not allowed to treat the desirability of preserving those elements as mere material considerations to which it could simply attach such weight as it saw fit; when a local authority found that a proposed development would harm a listed building's setting or a conservation area's character and appearance, it had to give that harm considerable importance and weight.

Paragraph 49 of the **Forge Field** judgment states "*an authority can only properly strike the balance between harm to a heritage asset on the one hand and planning benefits on the other if it is conscious of the statutory presumption in favour of preservation and if it demonstrably applies that presumption to the proposal it is considering*". The **South Lakeland (2014)** judgment also states "paragraph 134 is something of a trap for the unwary if read – and applied – in isolation" (paragraph 53).

The **NPPF** is particularly relevant at paragraph 6, 7, 8, 14, 17, 56-57, 60-61, 126, 128 - 134, 186- 191, 196-197, 215- 216 and Annex 2.

NPPF paragraph 132 states "*When 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. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification*".

The **NPPG** is particularly relevant in stating:

Heritage assets are an irreplaceable resource and effective conservation delivers wider social, cultural, economic and environmental benefits.

Distinctiveness is what often makes a place special and valued. It relies on physical aspects such as:

*building forms;
details and materials;
style and vernacular.*

Pre application discussions are an opportunity to discuss the design policies, requirements and parameters that will be applied to a site.

The **HEPPG** is particularly relevant at paragraph 142 -143, 149-151, 153, 179-180, 182-189 and 187.

HEPPG paragraph 179 states "*The fabric will always be an important part of the asset's significance. Retention of as much historic fabric as possible is therefore a fundamental part of any good alteration or conversion, together with the use of appropriate materials and methods of repair. It is not appropriate to sacrifice old work simply to accommodate the new*".

HEPPG paragraph 180 states "*The junction between new work and the existing fabric needs particular attention, both for its impact on the significance of the existing asset and the impact on the contribution of its setting. Where possible it is preferable for new work to be reversible, so that changes can be undone without harm to historic fabric. However,*

reversibility alone does not justify alteration. If alteration is justified on other grounds then reversible alteration is preferable to non-reversible. New openings need to be considered in the context of the architectural and historic significance of that part of the asset. Where new work or additions make elements with significance redundant, such as doors or decorative features, there is likely to be less impact on the asset's aesthetic, historic or evidential value if they are left in place".

HEPPG paragraph 182 states *"The plan form of a building is frequently one of its most important characteristics and internal partitions, staircases (whether decorated or plain, principal or secondary) and other features are likely to form part of its significance. Indeed they may be its most significant feature. Proposals to remove or modify internal arrangements, including the insertion of new openings or extension underground, will be subject to the same considerations of impact on significance (particularly architectural interest) as for externally visible alterations".*

HEPPG paragraph 184 states *"The introduction of new floors into a building or removal of historic floors and ceilings may have a considerable impact on an asset's significance".*

HEPPG paragraph 187 states *"Small-scale features, inside and out, such as historic painting schemes, ornamental plasterwork, carpenters' and masons' marks, chimney breasts and stacks, inscriptions and signs, will frequently contribute strongly to a building's significance and removing or obscuring them is likely to affect the asset's significance".*

HEPPG paragraph 189 states *"new services, both internal and external can have a considerable, and often cumulative, effect on the appearance of a building and can affect significance. The impact of necessary services can be minimised by avoiding damage to decorative features by carefully routeing and finishing and by use of materials appropriate to the relevant period, such as cast iron for gutters and down-pipes for many Georgian and Victorian buildings".*

Core Strategy Submission version as proposed to be modified is particularly relevant at Policy DME4.

'Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment' (English Heritage, 2008) identifies four groups of heritage values: Evidential, Historical, Aesthetic and Communal.

Paragraph 91 states:

"Evidential value, historical values and some aesthetic values, especially artistic ones, are dependent upon a place retaining (to varying degrees) the actual fabric that has been handed down from the past; but authenticity lies in whatever most truthfully reflects and embodies the values attached to the place (Principle 4.3). It can therefore relate to, for example, design or function, as well as fabric. Design values, particularly those associated with landscapes or buildings, may be harmed by losses resulting from disaster or physical decay, or through ill-considered alteration or accretion".

'Constructive Conservation in Practice' (English Heritage, 2008) states *"Constructive Conservation is the broad term adopted by English Heritage for a positive and collaborative approach to conservation that focuses on actively managing change.*

The aim is to recognise and reinforce the historic significance of places, while accommodating the changes necessary to ensure their continued use and enjoyment ...

... The Principles also underline the importance of a systematic and consistent approach to conservation. In order to provide this consistency, we are guided by a values-based approach to assessing heritage significance”.

The 'Building in Context Toolkit: New Development in Historic Areas' (CABE, EH, the architecture centre) identifies 8 building in context principles.

Morton B, "Structure of Georgian Houses", Context (IHBC) 80, July 2003 states:

"Floors are constructed of timber above basement level. The structural support for these floors is provided by the external walls, and generally a timber-stud partition clad with lath and plaster as a central load-bearing wall running up through the building. At ground floor level this major cross partition is generally constructed of solid brickwork. In many cases the cross partition at first floor level is in a different line to the cross partition in the ground floor level.

Timber-stud partitions clad with lath and plaster are used throughout to support floors. It is unusual to find any masonry internally above ground-floor level, except in the case of large Georgian houses where the staircase is of stone construction. In this case, brick walls are usually carried up alongside the staircase to the underside of the staircase to first-floor level, and occasionally to second-floor level.

The floor joists are built into the front and rear walls, restraining them. In larger houses there are generally main beams which divide up the floors, spanning the width of the building. Sometimes they run from front to back, restraining the front and rear walls either by secondary joists bearing on to the walls or the principal beams bearing on to those walls. The party walls are a minimum of one brick thick, strengthened by the chimneybreast to provide lateral restraint to the walls. The face of the chimneybreast is generally only half a brick thick”.

The Planning Inspector's comments are noted from APP/T2350/E/12/2185264/NWF (28 Church Street, Ribchester; 2 July 2013) in respect to the importance of plan form retention as a record of historic building use (even when associated historic fabric does not survive):

"Part of the importance of a listed building lies in the legibility of its original pattern of use – through its plan layout

... However, whilst the statement notes that the interior has been fully modernised and contains very few historically or architecturally significant elements, the plan form and its origins have not been analysed. Although the Framework requires that applicants provide sufficient information regarding the effect of the proposal on the significance of the heritage asset to enable the potential impact to be understood, little evidence has been provided as to the evolution of the current plan form

... Internally the plan layout would be further substantially re-configured by the proposal

... Whilst these interventions have been carefully designed and would make good use of the available space to maximise the provision of modern accommodation, they would further distort the original plan form and obscure an appreciation of the historic pattern of use

... I also agree with the appellant that the staircase is modern in its styling and the bottom dog-leg landing arrangement may not be the original one – but I have seen little evidence to

convince me that this is not the original staircase position, or that the historic significance of the plan and structure of the building have been properly analysed, as required by development plan and national policy, so as to justify this fundamental alteration and provide sufficient information on which to base a decision ”.

The Planning Inspector's comments are noted from APP/T2350/E/07/2041941, 58 Moor Lane, Clitheroe (12 October 2007; Grade II listed building):

“Internally, the proposed provision of an en-suite bathroom within the front first floor bedroom would be uncomfortably close to the existing fireplace and would distort the original shape of the room. Insufficient measured detail has been submitted to reassure me that this could be satisfactorily achieved without a physical conflict with this attractive original fitting. The provision of drainage for the proposed first floor WCs between the floor joists is indicated, but no installation details have been provided to demonstrate that this is feasible, with sufficient falls, within the existing depth of joists. Furthermore, no reference has been made to the provision of a heating system, which would be necessary for modern living but the installation of which should be carefully planned” (paragraph 9).

The Planning Inspector's comments are noted from APP/T2350/E/13/2194332 (8 Church Brow, Clitheroe; 13 January 2014):

“The third element of the works relates to the installation of a shower room on the landing at second floor level. This large open landing provides access to 2 attic rooms and is currently used as a storage/study area. The proposed shower room would include a wash basin, a WC and a shower. All of those items require servicing, including ventilation and related water/sewage pipe work. However, unlike the basement these would need to exit the building either internally or externally to ground floor level. The appellant has not supplied any information to show how these services would exit the building. I am unconvinced that a condition could adequately control these works so as to prevent harm to the listed building; especially in relation to the required water and soil pipes. As such I conclude that there would be harm to the special architectural and historic interest of No 8”.

The Planning Inspector's comments are noted from APP/T2350/E/10/2135049, 35 King Street, Whalley (16 December 2010; Grade II listed building of double-pile plan) “the new stud partition in the rear ground floor room would be especially harmful because it would subdivide an original room, would create an incongruous dog-leg corridor, and would result in the creation of a narrow room without natural lighting” (paragraph 5).

The Ribchester Conservation Area Management Guidance (The Conservation Studio consultants; subject to public consultation) concerns external alterations and *“is not exhaustive and is aimed primarily at unlisted buildings within the conservation area”.*

The now defunct 'Best Practice Guidance on Listed Building Prosecutions' (CLG, 2006) stated:

“The options open to a local authority – enforcement enables an authority to require remediation of unauthorised works to a listed building to either bring a building either back to its former state or, where that is not practical or desirable, to alleviate the unauthorised works. The focus of enforcement action is clearly the building itself. Prosecutions, meanwhile, cannot remediate the building but will, where appropriate, both punish a perpetrator of unauthorised works and act as a deterrent, both to others and to the commission of repeat offences”.

Mike Harlow, Governance and Legal Director, English Heritage (in 'Legal Developments' Conservation Bulletin Issue 71: Winter 2013) states: "Planning decisions are all about balanced judgment, but in that exercise there must be a sense of the weight society, through parliament, wishes to place on an objective like heritage conservation. The protection of listed buildings and conservation areas is clearly regarded as highly important, and that obviously should not be forgotten, out of respect for the democratic will as well as the law".

Submitted information

The Heritage Statement identifies:

"original spine beams over the front rooms carry the upper floors" (5.3).

"until the present alterations the staircase was situated within the rear room and its position and gradient can still be seen within the adjacent plastered wall; this is also its position on the 1977 existing survey drawing and possibly was its original position" (5.4).

"the attic comprises a single, unheated room whose floor joists and boards have been replaced in the present alterations. Aspects of the historic roof structure are visible within this space (purlins and some original rafters in the rear roof pitch), along with a small blocked opening to the gable" (5.6).

"Aspects of the interior also contribute to the heritage significance of the building, despite the 1977 changes, which included changes to circulation within the original dwelling, in part associated with the building's extension. The significant aspects include the plan form, with its division into front and back rooms (still discernible despite the removal of part of the dividing walls), and the location of the staircase within the rear ground floor room. The pair of first floor beams are also an essential component of the plan form and structure".

"Removal of partitioning forming an entrance lobby and the formation of a new entrance lobby - The entrance lobby appears to have been a twentieth century insertion and its reconstruction would be neutral as regards any impact on heritage significance".

"Removal of a staircase leading from the ground floor to the first floor and the insertion of a new staircase - The replacement of the previous staircase by the present unauthorised one undoubtedly had a negative impact on the internal space and its historic plan form, so it is proposed to re-site the new stair further back into the ground floor space, much closer to its historic position, which would also allow repairs to the severed beam overhead (see below). This would not be an attempt to restore or recreate the historic stair, as modern standards impose a need for a less steep gradient, and risers and steps to reflect modern day safety and building regulations requirements".

"Repairs to the previously severed ground floor ceiling beam and the removal of a previously installed salvaged timber support post to the ceiling beam - It is accepted that the unauthorised severing of the ceiling beam had an obvious negative impact on the fabric and internal space of the heritage asset, and it is proposed to piece-in a repair to restore the beam to its original length, spanning the room. This would reduce the impact of this aspect of the unauthorised work to the minimum now achievable".

"Removal of partitioning at first floor, and installation of non-original partitioning to allow for the formation of a revised room layout - The unauthorised removal of some elements of partitioning from the first floor has had a slight effect on the plan form but it is likely, although impossible to prove, that these were relatively modern elements inserted to give privacy to the rear bedroom, which was probably not a concern when the cottage was built. Some new

partitioning is now proposed to give additional privacy regarding access to the bathroom within the extension, in line with modern standards, and the minor effect this would have on historic plan form is considered fully justified on this basis".

"Removal of a recently installed staircase leading from the first floor to the attic Floor - There is no evidence for there having been a second staircase prior to 1977/8, and that removed during the unauthorised work was evidently very modern, and of poor quality construction; its removal therefore has a positive impact on the building's significance".

A Listed Building Consent Support Statement has also been submitted.

Conclusions

The proposed works are (in the main) those requested by the Borough Council and are acceptable.

In attaching considerable importance and weight to the statutory duties at section 16, 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 I would therefore recommend that listed building consent be granted.

RECOMMENDATION: That conditional listed building consent be granted.