

Heritage Statement

20 Stone Street, Gravesend, Kent DA11 0NP

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Client: Johal Real Estate

Ref: 01093

1.0 INTRODUCTION

- 1.1 This Heritage Statement has been prepared by Ignus Froneman, Director at Cogent Heritage, in consultation with the Applicant and West Green Planning. The report accompanies a listed building consent application for proposed internal changes to the grade II listed house at 20 Stone Street in Gravesend (also referred to as the 'subject property').
- 1.2 The author of this report is a qualified heritage consultant with over 20 years of experience in the historic environment. This includes regular appearances as an expert witness at public inquiries, on behalf of both appellants, public bodies and local planning authorities.

Purpose of the report, site inspection and research

- 1.3 The Heritage Statement assesses the effects of the proposed changes on the heritage significance of the listed building. The subject property also falls in the Upper Windmill Street Conservation Area. Aside from an external enhancement to the listed building¹, the proposed development would not affect the character, appearance and significance of the conservation area, and it is not considered further.
- 1.4 The Heritage Statement was informed by a site visit, in January 2025, and desk-based documentary research. The inspection was non-intrusive, i.e. no surface/decorative treatments were removed to expose underlying fabric. Photos were taken on the site visit, a selection of which have been included to illustrate the report; they have not been altered, aside from cropping or annotation in some instances.

¹ The removal of the existing pebbledash render and replacement with lime – see the impact assessment.

- 1.5 The purpose of the documentary research was to establish readily available sources of information about the history and evolution of the building. This is intended to be informative, but it is not intended to be comprehensive/exhaustive and it is therefore possible that other sources of information relating to the building exist.

Legislation and policy summary (relevant to heritage matters)

- 1.6 The section below summarises the key provisions of s.66 & s.72 of the Planning Listed Buildings and Conservation Areas Act 1990, the National Planning Policy Framework and the Development Plan policies.
- 1.7 **Legislation:** Legislation relating to listed buildings and conservation areas is contained in the Planning (Listed Buildings and Conservation Areas) Act 1990 (the Act). Section 66(1) of the Act sets out the statutory duty in relation to development affecting the setting of listed buildings: and section 72(1) sets out the statutory duty in relation to any buildings or other land in a conservation area.
- 1.8 It is a well-established concept in case law that 'preserving' means doing no harm for the purposes of the 1990 Act. The Court of Appeal's decision in *Barnwell Manor Wind Energy Ltd v East Northamptonshire District Council* [2014] (EWCA Civ 137) established that, having 'special regard' to the desirability of preserving the setting of a listed building under s.66, involves more than merely giving weight to those matters in the planning balance. There is a strong statutory presumption against granting planning permission for any development which would fail to preserve a listed building or its setting (and the same for conservation areas). In cases where a proposed development would harm a listed building or its setting (or a conservation area), the Barnwell decision has established that the duty in s.66 of the Act requires these must be given "*considerable importance and weight*".
- 1.9 The key legal principles established in case law are:
- i. 'Preserving' for the purposes of the s.66 and s.72 duties means 'to do no harm'².
 - ii. The desirability of preserving the setting of a listed building, or the character or appearance of a conservation area must be given 'considerable importance and weight'³.

² *South Lakeland District Council v Secretary of State for the Environment* [1992] 2 AC 141 per Lord Bridge at p.146E-G in particular (obiter but highly persuasive).

³ *Bath Society v Secretary of State* [1991] 1 WLR 1303, at 1319 per Glidewell LJ and *East Northamptonshire DC v SSCLG* [2014 EWCA Civ 137] (Barnwell Manor), at [22-29] per Sullivan LJ.

- iii. The effect of NPPF paragraphs 212-215 is to impose, by policy, a duty regarding the setting of a conservation area that is materially identical to the statutory duty pursuant to s.66(1) regarding the setting of a listed building (and s.72 in relation to the character and appearance of a conservation area)⁴.
- iv. NPPF paragraph 215 appears as part of a 'fasciculus' of paragraphs, which lay down an approach corresponding with the s.66(1) duty (and similarly the s.72 duty)⁵.
- v. If harm would be caused, then the case must be made for permitting the development in question, and the sequential test in paragraphs 213-215 of the NPPF sets out how that is to be done. If that is done with clarity, then approval following paragraph 215 is justified. No further step or process of justification is necessary⁶.
- vi. In cases where there may be both harm and benefits, in heritage terms, great weight has to be given to the conservation and enhancement of a listed building, and its setting, and the preservation and enhancement of a conservation area. It is, however, possible to find that the benefits to the same heritage assets may be far more significant than the harm⁷.
- vii. An impact is not to be equated with harm; there can be an impact which is neutral (or indeed positive)⁸.

1.10 **The National Planning Policy Framework:** Section 16 of the revised (February 2025) National Planning Policy Framework (the NPPF) deals with conserving and enhancing the historic environment, in paragraphs 202 to 221.

1.11 Paragraph 202 of the NPPF states that heritage assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance.

1.12 According to paragraph 207 applicants should describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than

⁴ *Jones v Mordue* [2015] EWCA Civ. 1243 per Sales LJ [at 28].

⁵ *Jones v Mordue* [at 28] per Sales LJ.

⁶ *R (Pugh) v Secretary of State for Communities and Local Government* [2015] EWHC 3 (Admin) as per Gilbart J [at 53].

⁷ *R (Safe Rottingdean Ltd) v Brighton and Hove CC* [2019] EWHC 2632 (Admin) as per Sir Duncan Ouseley [at 99].

⁸ *Pagham Parish Council v Arun District Council* [2019] EWHC 1721 (Admin) (04 July 2019), as per Andrews, J DBE [at 38].

is sufficient to understand the potential impact of the proposal on their significance.

- 1.13 According to paragraph 212, which applies specifically to designated heritage assets, great weight should be given to a heritage asset's conservation (the more important the asset, the greater the weight should be). This reflects the provisions of the 1990 Act in that it applies irrespective of whether it involves total loss, substantial harm, or less than substantial harm to significance.
- 1.14 Paragraph 213 states that any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification. It then deals with substantial harm to, or total loss of significance of, different types of designated heritage assets. Paragraph 214 continues on the subject of substantial harm.
- 1.15 Paragraph 215, on the other hand, deals with less than substantial harm. Harm in this category should be weighed against the public benefits of the proposal. The National Planning Practice Guidance (NPPG) describes public benefits as "*anything that delivers economic, social or environmental progress*".
- 1.16 The **Development Plan** includes the Gravesham Local Plan Core Strategy (2014) and Gravesham Local Plan: First Review (1994).
- 1.17 **The Gravesham Local Plan Core Strategy (2014)**: Policy CS20, entitled "*Heritage and the Historic Environment*" is the most relevant of the Core Strategy policies:

Policy CS20: Heritage and the Historic Environment

5.16.10 The Council will accord a high priority towards the preservation, protection and enhancement of its heritage and historic environment as a non-renewable resource, central to the regeneration of the area and the reinforcement of sense of place. Particular attention in this regard will be focused on those heritage assets most at risk through neglect, decay or other threats. Securing viable, sustainable and appropriate futures for such assets at risk will need to be reconciled with the sensitivity to change that many present.

5.16.11 Proposals and initiatives will be supported which preserve and, where appropriate, enhance the significance of the Borough's heritage assets, their setting where it contributes to the significance of the asset and their interpretation and enjoyment, especially where these contribute to the distinct identity of the Borough. These include:

- *Gravesend Town Centre, its development as a heritage riverside town, and its setting;*
- *The Borough's urban and rural conservation areas; and*
- *Surviving built features and archaeology relating to the Borough's maritime, military, industrial and transport history.*

5.16.12 When considering the impact of a proposed development on a designated heritage asset, the weight that will be given to the asset's conservation value will be commensurate with the importance and significance of the asset. For non-designated assets, decisions will have regard to the scale of any harm or loss and the significance of the heritage asset.

1.18 Gravesham Local Plan: First Review: Policy TC2 deals with listed buildings and is quoted below:

"Policy TC2

The Borough Council will adopt the following approach to applications affecting listed buildings:-

- (i) Proposals which involve the demolition of listed buildings will not be granted consent unless the applicant is able to demonstrate substantial and overriding reasons why such consent should be forthcoming. In those few cases where the Borough Council is satisfied that there is no alternative but to grant consent for such demolition, all available means will be used to secure early and appropriate redevelopment.*
- (ii) In the case of applications for development involving alterations or extensions to listed buildings or affecting the setting of listed buildings, the primary consideration of the Borough Council will be the maintenance of the integrity of the original listed building. Proposals will also need to be sympathetic to the listed building in terms of massing, scale, appearance and materials.*
- (iii) Applications for the change of use of listed buildings will be considered on their merits, in relation to the land use policies set out in this Written Statement. A major consideration will be whether the character or appearance of the listed buildings will suffer as a result."*

2.0 ASSESSMENT OF SIGNIFICANCE

Summary Historic Background

2.1 The *Upper Windmill Street Conservation Area Character Appraisal* (2009) (the 'Appraisal' hereafter) notes at section 8.2 that, in the C18, part of the route that is now Windmill Street was then known as Upper High Street. Prior to 1801, when New Road was constructed, Stone Street was regarded as part of Gravesend Backside (now Princes Street).

2.2 At section 4.2 the Appraisal notes that Windmill Street was developed during the first half of the C19, as the town expanded southwards. It was the principal approach route for visitors to Windmill Hill, and a number of buildings were erected to serve this tourism industry.

2.3 The same section of the Appraisal covers the terrace that 20 Stone Street forms part and this is quoted below:

"Nos. 21-23 Stone Street are some of the oldest buildings in the area, constructed in 1789 as Gravesend and Milton's workhouse. However, the buildings have been incorporated into a coherent block, with no. 20, and the former Station Inn public house, now Bar 24, behind a stucco façade, with a moulded cornice and parapet. Eclectic detailing between each building creates interest and variety, such as rusticated ground floor elevations, but overall the buildings are presented as a coherent historic group, and are an important backbone of the townscape in this area. Unfortunately modern shop signage, boundary treatments and pavement surface treatments undermine the historic character and appearance of the terrace."

2.4 The 1840 tithe map (**Fig 1**) shows the aforementioned workhouse. There appears to have been a building in the location of 20 Stone Street, although there is no detail about the form or nature of this structure. The apportionment records the land as owned by Jane Swinney and occupied by the Workhouse & Company. Comparison with the first edition Ordnance Survey map (**Fig 2**) suggests 20 Stone Street had not been built; it was added in 1847, when the workhouse was converted to housing. This probably reflected the opening of the railway line, in 1845, and the expansion of the town, which would have brought the workhouse into the settlement from its previously typically peripheral location.

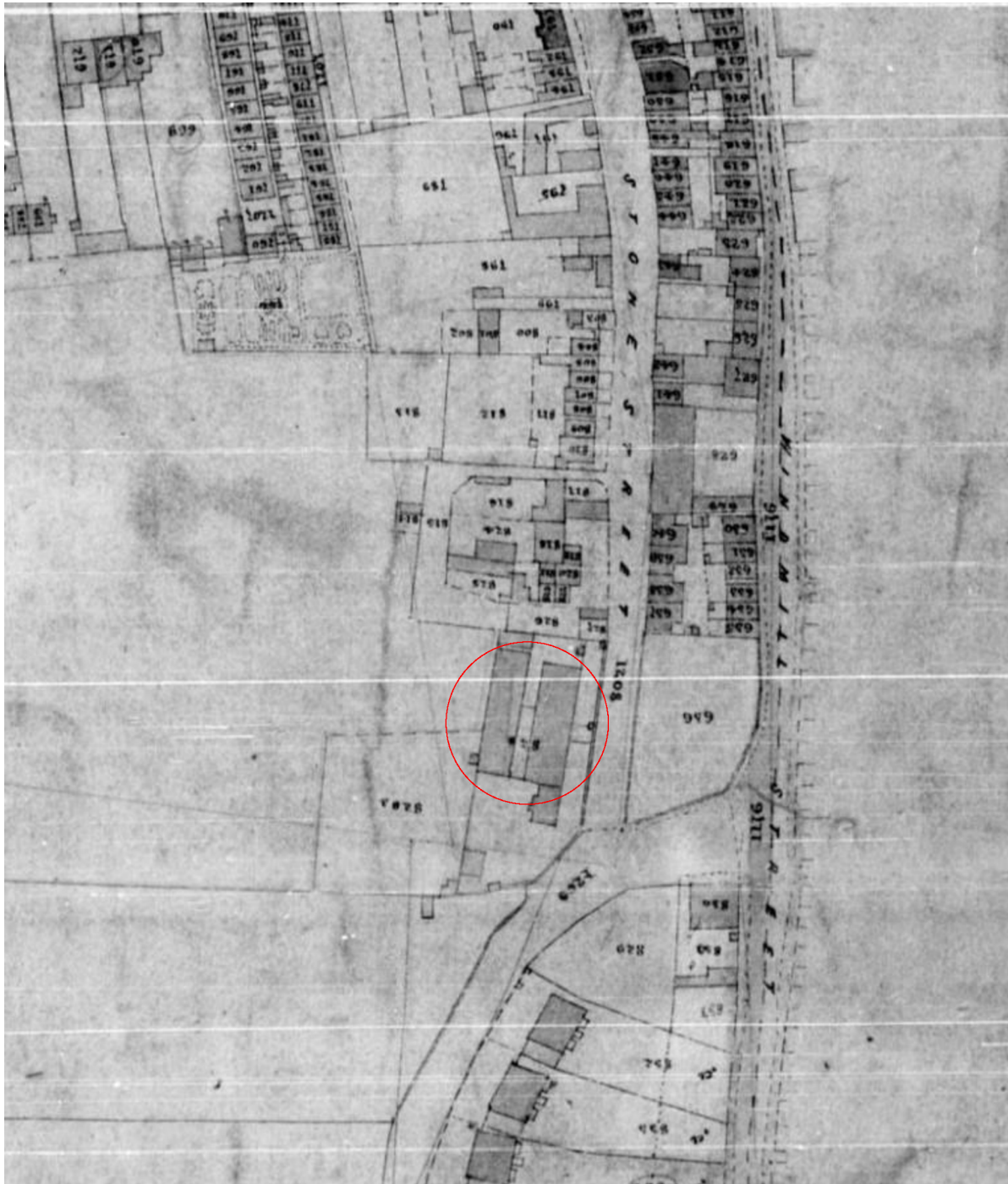


Fig 1: An extract of the 1840 tithe map rotated 180 degree, with north to the top).

2.5 The detailed extract of the 1866 Ordnance Survey map (**Fig 2**) shows 20 Stone Street as the southernmost house in a short terrace of four houses, bookended to the north by the Bricklayers Arms pub (24 Stone Street). The terrace was labelled 'Victoria Place' and must have formed a pair with 'Albert Place' to the south, no doubt in reference to the marriage of Queen Victoria and Prince Albert in 1840. Each house had a small front garden; 20 Stone Street had a front light well with dogleg stairs providing access to the basement. The small rear light well and the rear extensions are also recorded. To the south and SW was a timberyard.

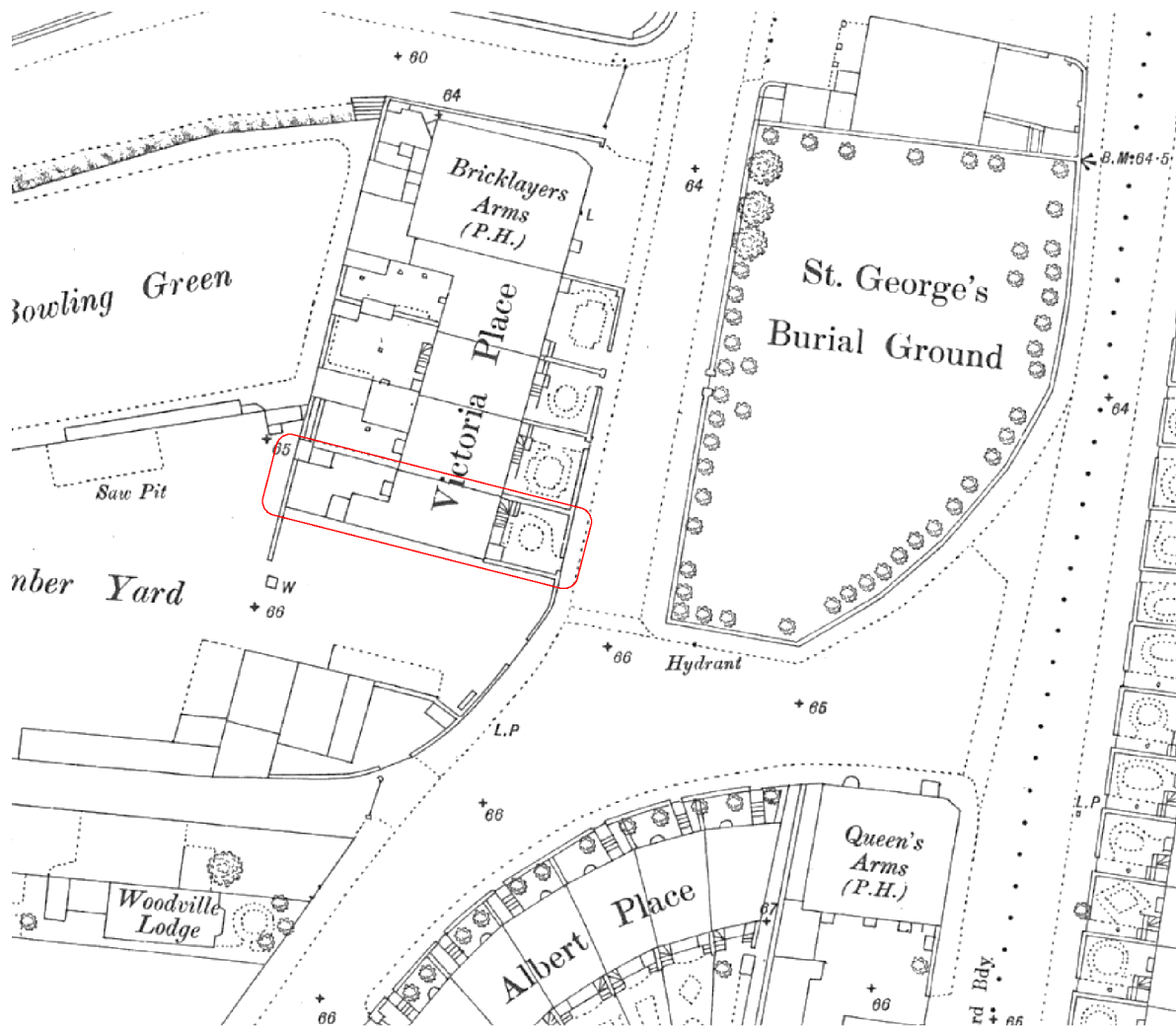


Fig 2: An extract of the 1866 Ordnance Survey map, showing the subject property in red.

- 2.6 The 1897 large scale Ordnance Survey map (**Fig 3**) records a similar arrangement in terms of 20 Stone Street, although the timber yard to the south (now unlabelled) had expanded. This includes a building that abutted 20 Stone Street on the south.



Fig 3: An extract of the 1896 Ordnance Survey map, showing the subject property in red.

2.7 The 1909 Ordnance Survey map (**Fig 4**) shows a similar situation, although by now the southern adjunct to 20 Stone Street had been reduced in depth.

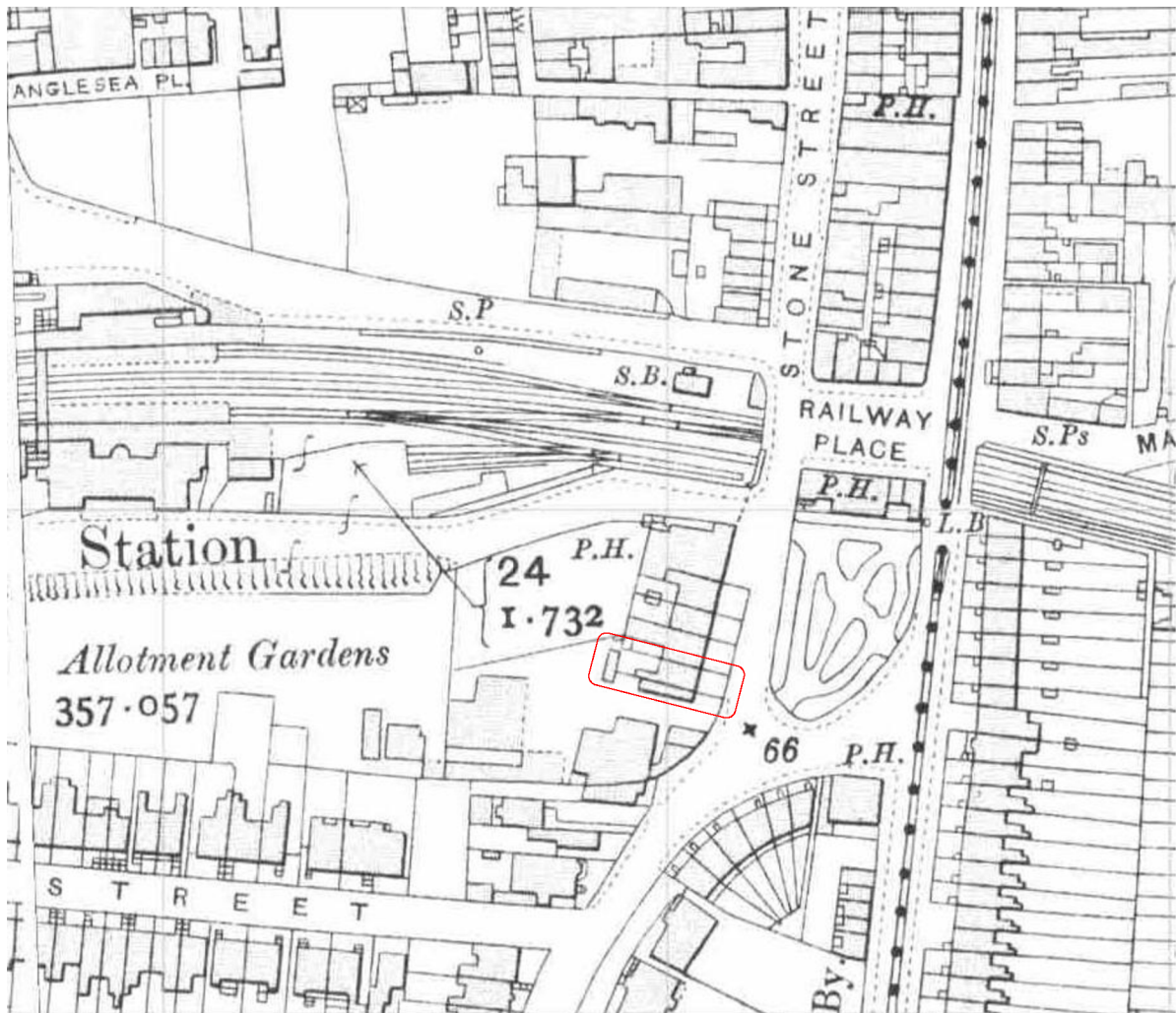


Fig 4: An extract of the 1909 Ordnance Survey map, showing the subject property in red.

2.8 An undated, early C20 photo shows the corner pub and part of the terrace (**Fig 5**), but unfortunately 20 Stone Street itself is not visible in the image.



Fig 5: An extract of an undated, early C20 photo of the corner pub.

2.9 The detailed extract of the 1938 Ordnance Survey map (**Fig 6**) shows a similar arrangement.

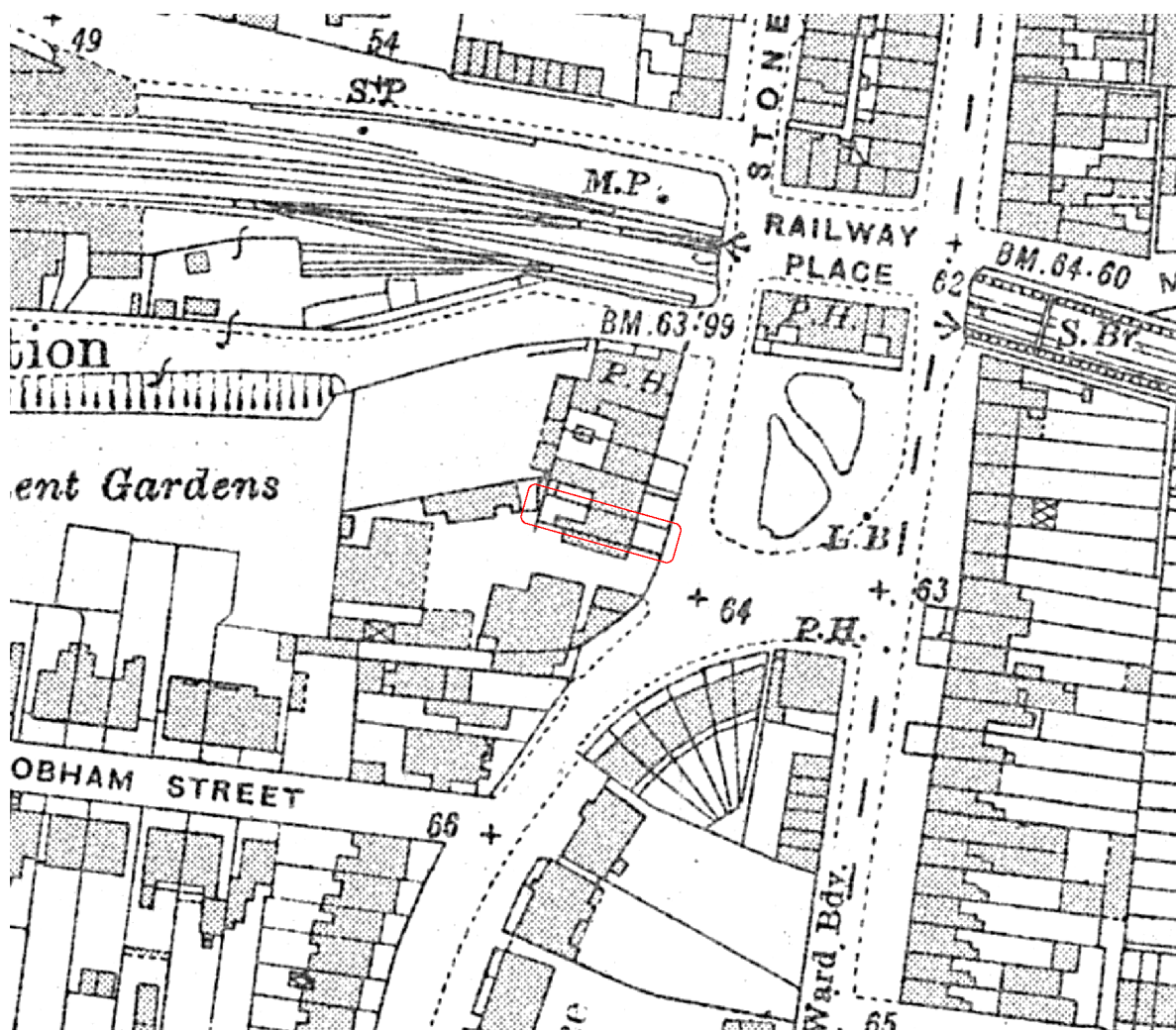


Fig 6: An extract of the 1938 Ordnance Survey map, showing the subject property in red.

2.10 The 1953 Ordnance Survey map (**Fig 7**) shows a similar arrangement at 20 Stone Street, albeit that there is a slight step now visible in the rear closet wing. The timber yard has become a tyre depot, and the southern adjunct to 20 Stone Street has been removed, seemingly with the creation the present retaining wall and passageway in this location.

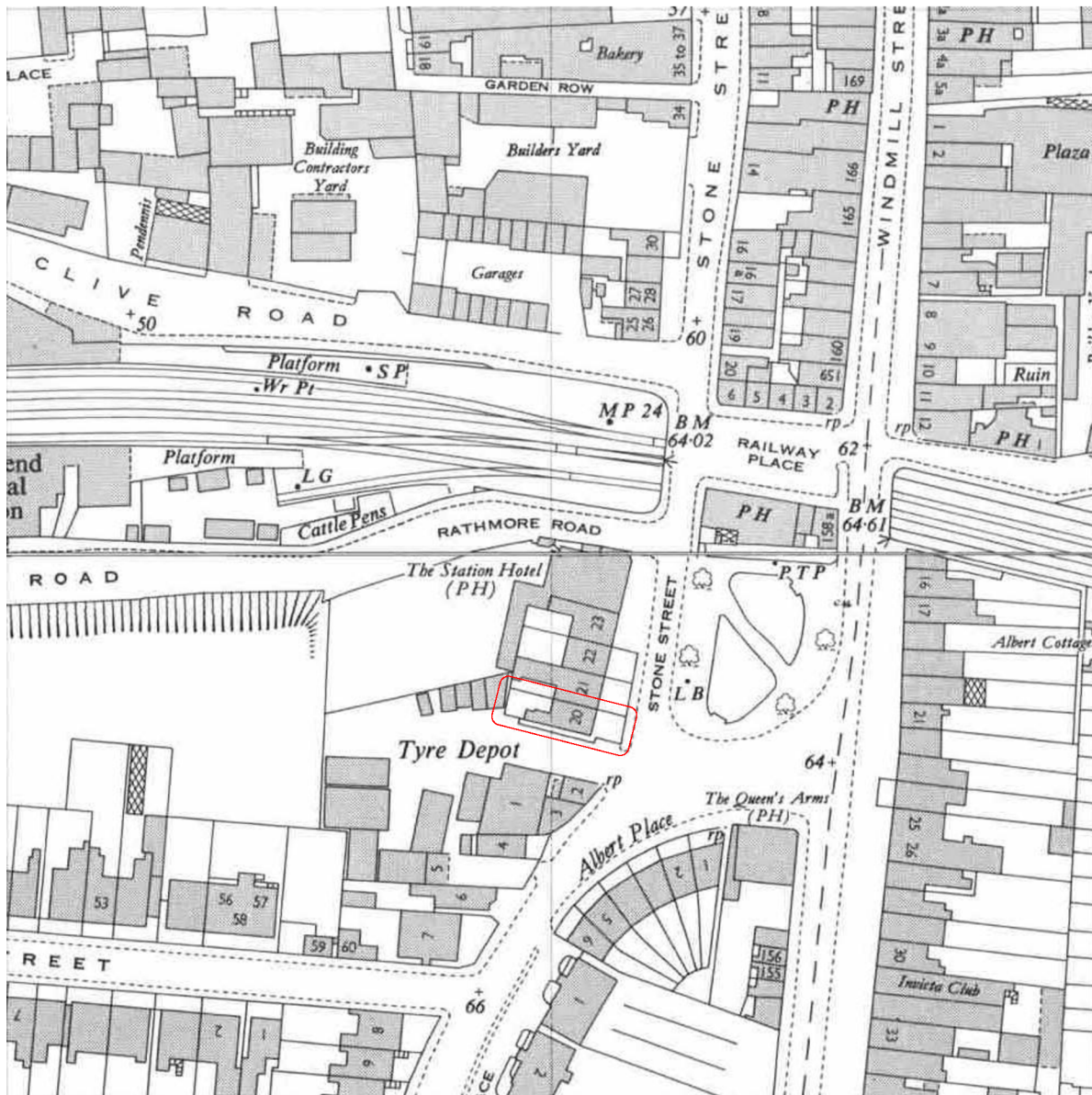


Fig 7: An extract of the 1953 Ordnance Survey map, showing the subject property in red.

The significance of the subject property

2.11 20 Stone Street was listed on 3 July 1975, as part of the rest of the terrace (taking in 20-24 Stone Street). The descriptive text from the list description on Historic England's National Heritage List is quoted in full below:

"A small terrace of houses. The core of Nos 21, 22 and 23 was originally the old workhouse erected in 1797. About 1847, it was converted into houses, Nos 20 and 24 added and the back part of the old building pulled down. 3 storeys and basement stuccoed. Parapet and cornice, 11 sashes in all with most glazing bars intact. Mainly moulded surrounds with architraves and cornices and brackets to 1st floor windows. Nos 20-23 have rusticated stuccoed ground floors. No 24 has a modern brick ground floor. Doorcases with rectangular fanlights to Nos 20 and

21. No 20 has a small modern shopfront, No 22 a shopfront and No 23 has a large round-headed arched shopfront with keystone.

Nos 20 to 24 (consec) form a group."

2.12 It appears from the list entry that the building was not internally inspected at the time of listing, as was common practice at the time. The house would have been listed instead on the basis of its age, and its group value with the rest of the terrace, as stated in the list entry. The group value of the terrace, with its coherent frontage to Stone Street, is plain to see from **Photo 1**.

2.13 **Photo 2** shows the facade of 20 Stone Street, which reflects the architectural style of the time and is a good example of a relatively modest mid C19 terraced house (though in reality it was added to the pre-existing building, which was modified to create the semblance of a terrace). The slight step in the façade marks the distinction between the former workhouse at 21 Stone Street and the purpose-built house at 20 Stone Street, albeit in a subtle way. There is also a slight misalignment in the windows of 20 Stone Street and its neighbour, but again this is relatively subtle. The glazed entrance door and plate glass shopfront, together with the somewhat garish fascia sign, are at odds with the façade. The loss of the front light well is regrettable.



Photo 1: A frontal view of the terrace at 20-24 Stone Street.



Photo 2: A view of the façade of the subject property.

2.14 The southern, side elevation (**Photo 3**) is now completely covered in cementitious pebbledash. Because of the projecting chimneystacks (which notably do not relate to the plan form of 20 Stone Street, where the fireplaces are set in the northern

party wall), the elevation looks truncated, as though the terrace once continued southwards. However, that is not what the historic Ordnance Survey maps record. Nevertheless, there was a structure to the south of 20 Stone Street and this must have been what the now redundant chimneystacks related to. There are two horizontal steel straps visible on the left, which have been used to quite literally tie or strap the little closet wing addition at the end of the building to the mono-pitched stairwell projection.



Photo 3: A view of the southern, side elevation.

- 2.15 The pebbledash is an unfortunate, poor quality finish that obscures the brickwork, although it probably also conceals the scars of the previously abutting structure. It is non-breathable and has the potential to cause damage to the building's fabric. As can be seen from the photos, in particular the rear (**Photos 4 & 5**), it is in a poor state, with flaking having occurred. This unsightly, poor quality and inappropriate finish markedly detracts from the building (and the Upper Windmill Street Conservation Area), but potentially also poses risks to the building's fabric.
- 2.16 The high level view of the rear of 20 Stone Street (**Photo 4**) shows the sorry state of the elevation, and also the top strap of the added little closet wing. In contrast with the coherent frontage, the view of the back of the terrace (**Photo 5**) shows the very clear difference between the houses that were converted from the former workhouse, and the subject property, with its butterfly roof and projecting staircase, which was added at the end of the former workhouse. Unlike the façade, from here it is not difficult to distinguish the different phases.



Photo 4: An elevated view of the rear of 20 Stone Street.



Photo 5: The back of the subject property (right), seen alongside the houses that were converted from the former workhouse (left).

- 2.17 Turning to the interior, the front and back room arrangement, with a service passage between the stairs and the front light well, has survived in a legible way. The front basement light well has been covered/internalised, but survives in a fossilised way (**Photo 6**), with the front room's basement window now filled with blockwork.



Photo 6: the front basement light well has been covered, but survives in a fossilised way, with the front basement window filled with blockwork.

2.18 The front basement room has been converted to a strong room and it is without any features of note, perhaps aside from the heavy steel door. There are a few interesting surviving features in the rear room; there is a little brick oven or stove-like structure adjacent to the chimneybreast (**Photo 7**) and this was probably for a copper.



Photo 7: The little brick oven or stove-like structure adjacent to the chimneybreast in the rear basement room.

2.19 Another interesting feature in the rear basement room is the window reveal, which has a set of internal guide rails with pulleys, on the inside of the window reveal (**Photo 8**). These likely related to vertical sliding shutters that would have been contained in the box behind the radiator (see **Photo 7** above) and it is possible, though perhaps unlikely, that they are still *in situ*. The rear window looks to be original, although one of the glazing bars to the top sash has been removed. The visible components of the staircase at the basement have been replaced (**Photo 9**), possibly the result of decay from damp conditions at this level; this flight is of no intrinsic interest.



Photo 8: A detail of the window reveal at the rear basement room.



Photo 9: The basement stairs has been replaced.

2.20 The plan form at the ground floor is still broadly legible, although there must have been a passage between the entrance door and the rear staircase, which has been removed, and a large opening now connects the front and rear rooms (**Photo 10**). Although there is a cornice (**Photo 11**), this respects the current plan form and the crispness of the feature, along with the straight joints that can be seen in places, indicate this to be a modern replacement. The tripartite rear window is a replacement, and the opening was probably enlarged. The simple staircase with stick balusters and turned column newel (**Photo 12**) looks to be original.



Photo 10: The front ground floor room.

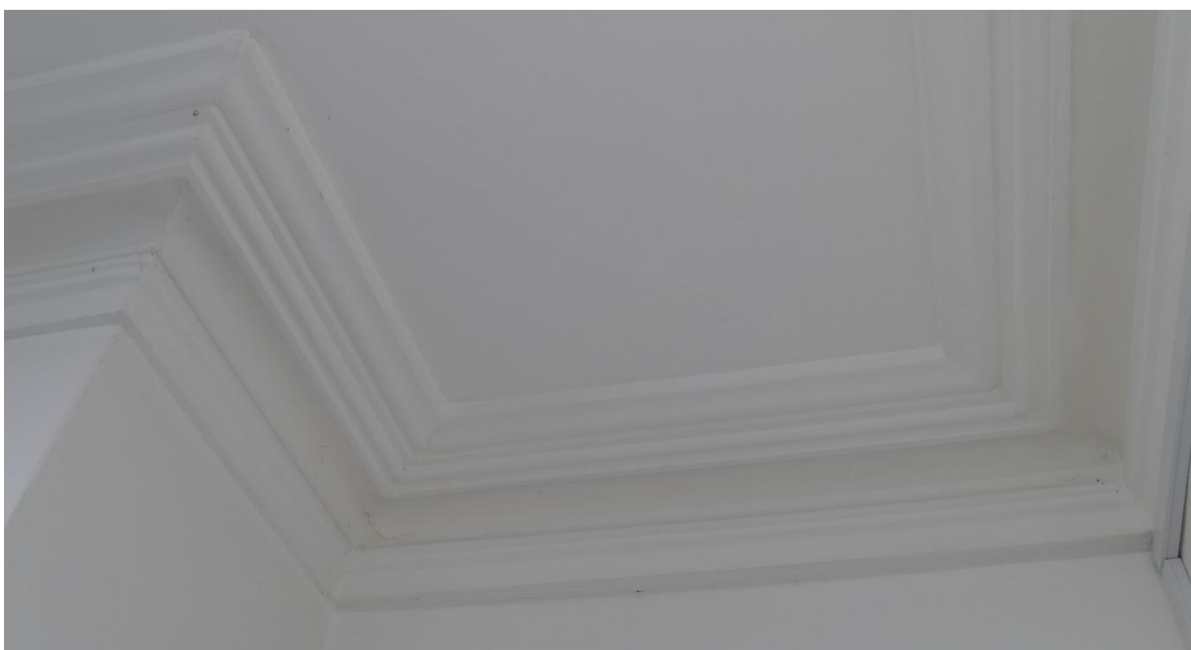


Photo 11: A detail of the cornice at the ground floor.



Photo 12: The staircase at the ground floor.

- 2.21 The rear closet wing at the half landing (**Photo 13**) is unsurprisingly featureless, although the bolt and tie plate of the external steel strap can be seen in the stairwell, where there is also a skirting board that looks to be original.



Photo 13: The rear closet wing at the half landing.

2.22 At the first floor, the plan form survives well at the rear of the building (the staircase, passage and rear room), but has been badly compromised at the front, where a small lobby and a room have been awkwardly inserted into the front room. There is an authentic-looking cornice that denotes the front room's proportions. The rear room is absent of a cornice, or any notable features. The windows (front and rear) look to be original, though in a poor state due to the effect of condensation sitting on the slim glazing bars and bottom rails. That is typical of windows of this age, but perhaps exacerbated here by the fact that the rooms look to be under-used and consequently they have perhaps not historically received the maintenance they might have otherwise. The crisp mouldings on the doorcases do not look to be of any great age, although it is possible that the frames are original. The two doors are both modern.



Photo 14: The front first floor room.

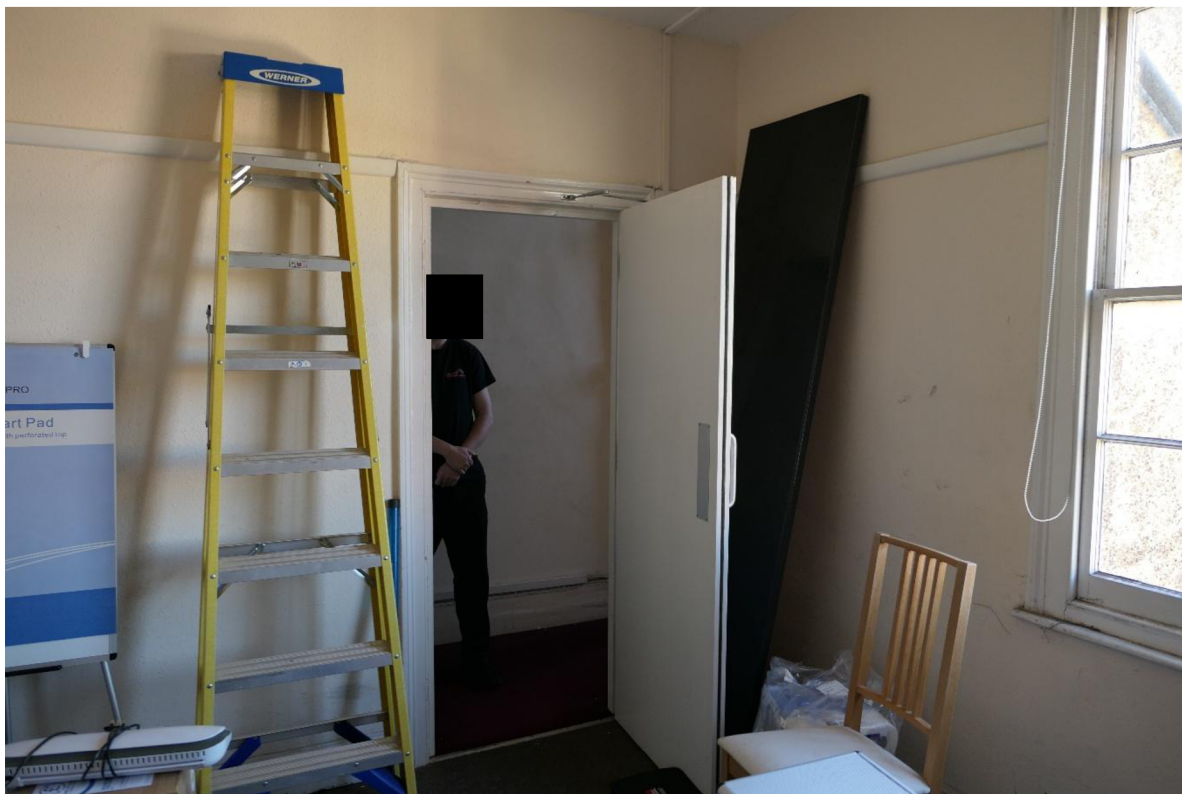


Photo 15: The rear first floor room.

- 2.23 The staircase at the second floor has been truncated by a boxed lobby (**Photo 16**). The plan form at the rear has been compromised by removal of the passage, to create a larger rear room (**Photo 17**). A rooflight has been inserted in this area. The partition between the front and rear rooms has been replaced with a modern part-glazed partition, with a door. There is off-the-peg modern coved cornicing to both rooms. The lath & plaster ceiling in the front room (**Photo 18**) has come loose in a couple of places, possibly the result of damp deterioration because the upper floor is evidently under-used. While the front windows are original, they are self-evidently in a poor state. The rear window has been replaced, presumably due to having deteriorated beyond repair in the past.
- 2.24 One of the panels above the niche next to the front room chimneybreast has a simple unmoulded recess. It appears to be of some age, but it could be Victorian or Edwardian; the niche has an original-looking plain, unmoulded skirting board internally, which suggests that infill panel, to make it flush with the chimneybreast, would have been added later.



Photo 16: The staircase at the second floor has been truncated by a boxed lobby.



Photo 17: The plan form at the rear has been compromised by removal of the passage, to create a larger rear room.



Photo 18: The second floor front room.

3.0 IMPACT ASSESSMENT

Summary of the proposed development

3.1 The proposed changes are summarised below and then assessed in turn:

- i. Removal of the cementitious pebbledash render and replacement with lime render.
- ii. Reconfiguration of the pipework at the rear to include soil/vents for the bathrooms.
- iii. Change of use of the upper floors to residential.
- iv. Replacement of non-original internal doors with new, fire rated doors.
- v. Removal of coverings and reinstatement of fireplaces to the rear rooms on the first/second floors.
- vi. Secondary glazing to the first and second floor windows.
- vii. Removal of the inserted partitions in the first floor front room.
- viii. Insertion of a kitchen in the first floor front room.
- ix. Insertion of a small bathroom in the first floor rear room.
- x. Insertion of a small bathroom at the second floor rear room, which reinstates the corridor.
- xi. Reinstatement of a wall between the second floor front and rear rooms.
- xii. Reinstatement of a door to the second floor front room, in the original location.
- xiii. Insertion of a kitchen in the second floor front room.

3.2 The proposals, as summarised above, are now set out and assessed in tabular form below. The table has been annotated with a green and red colour code that highlights areas of harm (red) and enhancements (green).

Proposal	Assessment
External (relevant to the listed building and conservation area)	
Removal of the cementitious pebbledash render and replacement with lime render.	This would aesthetically enhance the listed building by replacing an unsightly, inappropriate surface treatment with a more appropriate one. This would also: i. sustain the significance of the listed building, and ii. remove risks to it by replacing an impervious surface treatment with a breathable one. Both of these are described as examples of 'heritage benefits' in the National Practice Guidance (Paragraph: 020 Reference ID: 18a-020-20190723).

Proposal	Assessment
	There are two strands of heritage benefits (aesthetic enhancement, and sustaining the significance of the listed building/removing risks to it).
Reconfiguration of the pipework at the rear to include soil/vents for the bathrooms.	There is an existing downpipe at the rear; this would be reconfigured to serve the bathrooms, in cast metal pipework. This kind of alteration is neither uncommon, not inherently harmful.
Change of use of the upper floors to residential.	It is clear from inspection that the upper floors are under-used and, consequently, they are not well maintained (e.g. the dilapidated windows, and the ceiling that has come down in places on the second floor). This (under-use and consequent neglect of the upper floors above ground floor commercial units) is a common problem with commercial/residential buildings like this, the upper floors of which would once have been occupied by the shopkeeper. In principle, a residential use for the upper floors would, again: i. sustain the significance of the listed building, and ii. remove risks to it. This might also be regarded as an optimum viable use of the building, bearing in mind that any such must be <u>viable</u>, as well as being optimal. In principle, the proposed change of use of the upper floors would embody the three examples of 'heritage benefits' cited in the National Practice Guidance (Paragraph: 020 Reference ID: 18a-020-20190723).
Replacement of non-original internal doors with new, fire rated doors.	This would facilitate the residential conversion, while leaving the significance of the building unaffected. More appropriate panelled doors (which could be secured by condition) would be an enhancement.
Rewiring of the building.	This is a periodic maintenance issue and bringing the building up to current electrical installation standards can remove risks, e.g. fire damage or destruction, which sometimes affects older buildings where wiring has not been updated.
Removal of coverings and reinstatement of fireplaces to the rear rooms on the first/second floors.	This would enhance/better reveal the significance of the listed building by removing intrusions that obscure the original features in these rooms.
Secondary glazing to the first and second floor windows.	This would facilitate the residential conversion and improve the thermal performance of the building, while leaving the significance of the building unaffected. The installation of secondary glazing is neither uncommon where original windows exist, nor is it inherently harmful.
Removal of the inserted partitions in the first floor front room.	This would enhance/better reveal the significance of the listed building by removing intrusions that obscure the original layout and room proportions.
Insertion of a kitchen in the first floor front room.	This would generally leave the legibility of the room intact and facilitate the beneficial use of the upper floors. A very minor degree of harm is ascribed due to this overlapping

Proposal	Assessment
	the chimneybreast and thereby having a minor effect on the legibility of the overall first floor plan form.
Insertion of a small bathroom in the first floor rear room.	This would affect the original layout and room proportions. A minor degree of harm is ascribed due to the effect on the legibility of the plan form. It should be noted that, conversely, the general plan form and legibility of the rear room would not be obliterated, and the effect of this is far lower than the existing division of the front room, which would be removed.
Insertion of a small bathroom at the second floor rear room, which reinstates the corridor.	On one hand, this would be harmful in the sense that there would be a bathroom within the rear room. On the other hand, this would reinstate a legibility of plan form on the second floor that does not presently exist, and which would be an enhancement. The assessment is undertaken on the basis that the overall effect of this intervention is neutral, when the harm of a bathroom in the rear room is balanced with the reinstatement of a plan form that would improve on the existing layout.
Reinstatement of a wall between the second floor front and rear rooms.	This would enhance/better reveal the significance of the listed building through a reinstatement of the original layout/plan form.
Reinstatement of a door to the second floor front room, in the original location.	This would enhance/better reveal the significance of the listed building through a reinstatement of the original layout/plan form.
Insertion of a kitchen in the second floor front room.	As at the first floor, a very minor degree of harm is ascribed due to this overlapping the chimneybreast and thereby having some effect on the legibility of the plan form. It is not considered that the removal of the panel over the chimneybreast niche would materially affect the significance of the building.

3.3 The tabulation above shows that the positive effects of the proposal would be greater than the harm caused. The effects are not all equal, e.g. the removal of the pebbledash render and replacement with lime would have far greater effects (i.e. aesthetic enhancement, and sustaining the significance of the listed building/removing risks to it) than, for example, the insertion of kitchen counters over the chimneybreasts on the first and second floors. It can also be noted that the removal of the pebbledash render and replacement with lime would enhance the character, appearance and significance of the Upper Windmill Street Conservation Area, so this is a dual heritage benefit.

3.4 Overall, the enhancements to the significance of the building (and the conservation area) would, by far, outweigh the low levels of harm that the required changes associated with the residential use of the upper floors would cause. This leaves a decisive net heritage benefit that weighs strongly in favour of the proposal.

4.0 CONCLUSIONS

- 4.1 This Heritage Statement presents a proportionate understanding of the significance of the listed building, and an assessment of the impacts of the proposed internal changes.
- 4.2 The proposed development would cause some harm in places, while also resulting in heritage benefits. Overall, the enhancements to the significance of the building (and the conservation area) would, by far, outweigh the low levels of harm.
- 4.3 This leaves a decisive net heritage benefit that weighs strongly in favour of the proposal.
- 4.4 This means the reference to harm in paragraphs 205-208 of the NPPF are not engaged, and the provisions of s.66 and s.72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) are satisfied. The proposals satisfy the Development Plan policies relating to heritage.