

**ROYAL BOROUGH OF WINDSOR & MAIDENHEAD
PLANNING COMMITTEE**

DEVELOPMENT CONTROL PANEL

7 March 2024

Item: 2.

Application No.:	23/01063/LBC
Location:	Ditton Manor Ditton Park Road Datchet Slough SL3 7JB
Proposal:	Consent for Hotel-led development comprising the conversion, extension and alteration of the existing Manor House and associated buildings, including the North Gatehouse, East Gatehouse, South Gatehouse, Chapel and Granary, to a flexible hotel and wedding/conference venue (Use Class C1 and Sui Generis) with associated ancillary facilities including bar, restaurant and gym/spa; additional two storey hotel accommodation block (Use Class C1); erection of a marquee for wedding/conference use (Sui Generis); demolition and erection of a new one storey community building (Use Class F2); car parking; landscaping; and other associated works
Applicant:	Ditton Park Property Unit Trust
Agent:	Mr Harry Spawton
Parish/Ward:	Datchet Parish/Datchet Horton And Wraysbury
If you have a question about this report, please contact: Sarah Chesshyre on or at sarah.chesshyre@rbwm.gov.uk	

1. SUMMARY

- 1.1 This application seeks listed building consent for a hotel-led development comprising the conversion and alteration of the existing Manor House and associated buildings to a hotel, wedding and conference venue with associated ancillary facilities.
- 1.2 The site is the subject of an associated application for planning permission (23/01062/FULL), which was presented to Windsor and Ascot Development Management Committee (WADMC) on 5th October 2023 with an officer recommendation for refusal, for six reasons, which related to harm to the Green Belt; harm to character; harm to designated heritage assets; a lack of information to enable an assessment of the highway impacts of the proposal; arboricultural harm and harm to ancient woodland; and the lack of a S106 legal agreement to secure financial contributions to a Carbon Offset Fund.
- 1.3 Following discussion of the application at WADMC, a motion was put forward to determine the application in line with the officer recommendation to refuse planning permission. This motion did not pass. A further motion was put forward to defer the application in order to allow additional and amended information to be submitted and considered by officers, in order to seek to address technical matters.
- 1.4 Amended plans and technical information was received by the Council on 1 December 2023.
- 1.5 The proposed works to the listed building are considered to be unacceptable because they would be harmful to the significance of the listed buildings.

It is recommended the Committee refuses listed building consent for the following summarised reasons (the full reasons are identified in Section 12 of this report):

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| 1. | The proposed development is harmful to the significance of the listed buildings. Though a number of public benefits can be identified from the proposed development they cannot outweigh the less than substantial harm caused by the harm to the significance of the listed Manor House. The proposed development is therefore contrary to Section 16 of the NPPF and Policy HE1 of the Borough Local Plan 2013-2033. |
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2. REASON FOR COMMITTEE DETERMINATION

- The Council's Constitution gives the Head of Planning discretion to choose not to exercise their delegated authority where they consider the matter should be referred to the relevant Area Borough Development Management Committee; the Head of Planning considers this application should be referred to committee.

3. THE SITE AND ITS SURROUNDINGS

- 3.1 The application site is entirely within Ditton Park, which is a Grade II Registered Park and Garden. The Manor House and its associated courtyard walls, stable and gatehouse blocks are Grade II listed. The Main Gatehouse, the connecting bridge, the Garden Walls and Summerhouse are also Grade II listed.

4. THE PROPOSAL

- 4.1 Listed Building Consent is sought for a hotel-led development with the provision of 130 bedrooms in total and associated facilities. The application can be split into two key areas, namely within the moated area and outside the moated area.
- 4.2 Amended plans and additional information were submitted to the Council on 1st December 2023. The description below is of the amended scheme.

Within the moated area

- 4.3 The proposal comprises the conversion of a number of existing buildings with internal alterations. The existing Manor House will be converted to a hotel to provide 31 bedrooms and associated facilities including bar, restaurant, and meeting rooms. The existing Northern Gatehouse will be converted into a spa facility. The Eastern Gatehouse will be converted into a storage and site security facility. The Southern Gatehouse will be converted to provide conference and wedding venue facilities.

- 4.4 The proposal also includes the removal of an existing (unauthorised) marquee and the introduction of a two-storey L-shaped accommodation block to the west of Manor House, which will provide 99 bedrooms and associated facilities including meeting rooms. With the new accommodation block, it will allow for a new courtyard and garden to be created to the west of Manor House. To the east of the Manor House, a new gym and back to house block will be proposed to provide a gym facility and a new service area to support the operation of the hotel. The proposed block will have a setback from the existing garden wall so a landscaped garden will be created between the wall and the new block. It is understood that the gym/spa facility will also be publicly accessible.

Outside the moated area

- 4.5 The proposal includes the erection of a marquee for wedding/conference use (Sui Generis) at the location of an existing scout hut building. The existing access will be altered to accommodate the provision of a new service area to support the new marquee. The existing parking area within the moated area will be removed and replaced by a woodland parking area to the south of the new marquee. The existing Chapel, which is within the curtilage of Manor House will mainly be used for weddings and events but will also be community use.
- 4.6 The proposal also includes the removal of the existing scout hut building which will be relocated to a parcel of land, which is at the northern part of the site and is surrounded by Ancient Woodland.

5. RELEVANT PLANNING HISTORY

- 5.1 Ditton Park has a lengthy planning history. Most of these cases are related to the adjacent employment site so they are not relevant to these applications.
- 5.2 In 1997, planning permission (97/75585/FULL) was granted for European Headquarters office building of 23,230sqm and change use of Ditton Manor House to D1 for an education/training centre with ancillary offices, access, parking, landscaping/highway works (Class D2). A listed building consent (97/75586/LBC) was also granted for the alteration and refurbishment of Ditton Park Manor House to provide an education and training centre including demolition of ancillary outbuildings.
- 5.3 Based on the Council's record, the existing marquee, which is located to the west of Manor House, is not subject to any planning permission
- 5.4 As noted above, the site is also subject to an application for full planning permission (23/01062/FULL) for the Hotel-led development comprising the conversion, extension and alteration of the existing Manor House and associated buildings, including the North Gatehouse, East Gatehouse, South Gatehouse, Chapel and Granary, to a flexible hotel and wedding/conference venue (Use Class C1 and Sui Generis) with associated ancillary facilities including bar, restaurant and gym/spa; additional two storey hotel accommodation block (Use Class C1); erection of a marquee for wedding/conference use (Sui Generis); demolition and erection of a new one storey community building (Use Class F2); car parking; landscaping; and other associated works.

6. DEVELOPMENT PLAN

- 6.1 The main relevant policies are:

i. Adopted Borough Local Plan

Issue	Policy
Historic Environment	HE1

7. MATERIAL PLANNING CONSIDERATIONS

i. National Planning Policy Framework Sections (NPPF) (2021)

Section 16 – Conserving and enhancing the historic environment

ii. Legislation – Planning (Listed Buildings and Conservation Areas) Act 1990

iii. Other National Guidance

- ▣ Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision Making (Historic England)

8. CONSULTATIONS CARRIED OUT

- 8.1 A site notice that was posted on 17.05.2023 and an advertisement that was placed in the local press on 18.05.2023.
- 8.2 9 neighbours were notified directly, and 8 letters and a petition were received in total, 1 letter was received supporting to the application, 7 letters were received objecting to the application including one petition which was signed by 29 local residents. Following the receipt of amended plans and additional information, further notification letters were sent to residents.
- 8.3 A number of concerns raised in the letters received are not relevant to this listed building consent application. However, they will be covered under a full planning application. The following table also summarises the points which are relevant to the current listed building application:

Comment		Where in the report this is considered
1	Concerns over the impacts of the proposed development on the listed buildings	Section 9

8.4 Statutory consultees

Consultees	Comments (first consultation):	Comments (second consultation):	Where in the report this is considered
RBWM Conservation	Objection: the proposed development would lead to less than substantial harm	Objection: the proposed development would lead to less than substantial harm	Section 9
Berkshire Gardens Trust	Objection: The proposal fails to demonstrate how it can preserve or enhance the character of the Registered Park and Garden and the setting of the listed buildings with respect to the significance of the historic environment.	Objection: amendments do not address previous comments	Section 9
The Georgian Group	Objection: The two-storey L-shaped accommodation block is significantly larger than the Grade II listed Manor House and the proposal would result a very high degree of less	Objection: amendments do not address previous comments	Section 9

	than substantial harm to the setting of the Manor House. The proposed gym block would infill the gap between the Manor House and the northern gatehouse. Considering the massing and scale of the proposed block, it would lead to a high degree of less than substantial harm to the setting of the Manor House and the northern gatehouse.		
Historic England	Historic England do not comment on applications affecting Grade II Listed Buildings	Historic England do not comment on applications affecting Grade II Listed Buildings	Noted.

8.5 Consultees

Consultees	Comments (first consultation):	Comments (second consultation):	Where in the report this is considered
Slough Borough Council	No objection subject to the submission of further information related to vehicular movements and the imposition of the recommended conditions.	No further comments received.	This is not relevant to a listed building consent application, but it will be covered under a full planning application.

8.6 Others (Parish and Amenity Groups)

Groups	Comments	Where in the report this is considered
Datchet Council Parish	No objection subject to appropriate conditions should be attached to the consent to be recommended by officers.	Section 8

9. EXPLANATION OF RECOMMENDATION

- 9.1 The Council has, in considering this application, had a special regard for the desirability of preserving the listed building as required under Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) (the Act).
- 9.2 The application is accompanied by a heritage impact assessment, which is prepared by Landgage heritage, on behalf of the applicant to support this application. An updated heritage impact assessment was submitted with the amendments, that reflects the changes made to the proposals. The report summarises that the proposed development would result in a substantial benefit to the significance of the Grade II listed Manor House and the Registered Ditton Park.
- 9.3 The Council's Conservation Officer has been formally consulted on this application and has raised no objection in principle to the proposed use of the existing Manor House as a hotel. However, there are significant concerns in terms of the proposed alterations to the Manor House. Overall, the Conservation Officer concludes that there would be less than substantial harm to the listed building, and objects to the proposals.
- 9.4 In addition, objections have been received from the Georgian Group, who are a statutory consultee, and from Berkshire Gardens Trust. Where an application for listed building consent is recommended for approval contrary to the views of the Georgian Group (National Amenity Society), it must be referred to the Secretary of State.

Grade II Listed Manor House

- 9.5 Ditton Park has a long history, dating back to the early medieval times. Ditton Park was in residential use when the first Manor House was built. In 1917, it was used as the Admiralty Compass Observatory for research and development. It then became the headquarters of the Defence, Evaluation and Research Agency. The site had been used for research and laboratory purpose until 1979. In 1997, the site was subject to a planning permission for an education and training centre. The southwestern part of the wider site was then redeveloped to the office complex in the early 2000s.
- 9.6 The original Manor House has existed on the site since the 15th Century, and it was rebuilt in the 17th Century. The 17th Century House however was destroyed under a fire in 1812. The House was then reconstructed in the 19th Century, which forms the current Manor House. The existing Manor House dates from the mid-19th century and it remains largely unaltered externally and internally particularly in term of its original plan form, with many of its principal rooms intact alongside the principal staircase, with a plastered and painted beamed ceiling and secondary staircases. The ground floor entrance of the House is well preserved with a decorated plaster beamed ceiling and attractive stone floor. The gallery leading from the main entrance is also heavily moulded and bother spaces are of high importance to the significance of the House. Historic doors, architraves, some cornicing historic skirting and fireplaces feature throughout the House.
- 9.7 The Manor House is externally rendered and in keeping with its Gothic revival architectural style featuring turrets and crenelations. The main entrance is centrally positioned along the eastern elevation, forming part of the three-storey section of the House and flanked by two-storey wings either side. The House entrance is framed by tall turrets extending beyond the roof level. Whilst the House is predominantly three storeys in height, the southern aspect includes a tower feature extending up to four storeys with a turret providing further access above. This is highlighted by the original bay feature along the southern elevation, with railing at first floor.

- 9.8 Chimneys stacks adorn the roof alongside the crenelated parapets. Label hood moulds feature over window openings and pointed arches are a notable feature of main doors and the windows either side of the entrance door.
- 9.9 It is evident that some features have been lost overtime due to previous uses and occupiers, somewhat eroding its authenticity. However, the architectural and historic interest of the Manor House has been appropriately preserved and in considering its future use there is an opportunity to better reveal its significance going forward.
- 9.10 The once open central courtyard has been covered over with a modern glazed structure. Whilst the roof cover is a notable lightweight solution, the floor level within the courtyard has also been altered, negatively affecting some of the historic openings into the courtyard.

New Lift

- 9.11 The proposal is seeking to install a new lift within the building, adjacent to the kitchen. Due to the creation of a new void within the House, the proposal would significantly alter the existing built fabric. However, it is not clear from the submitted documents what built fabric would be affected. In an absence of this information, the Local Planning Authority is unable to identify how those works would affect the significance of the House. It is in contrary to paragraph 201 of the National Planning Policy Framework (NPPF) and Policy HE1 of the Borough Local Plan 2013-2033 (BLP).
- 9.12 The lift would be located on the upper floors of the House within an existing cupboard. Further details of any structural inventions to support the lift structure and mechanism should be provided. However, such details can be conditioned in this regard.

Upgrade Works

- 9.13 The proposed conversion is supported by some upgrade works such as insulation and fire protection. However, no such details have been provided to support this application. In an absence of this information, the Local Planning Authority is unable to identify how those works would affect the significance of the House.

Ground Floor

- 9.14 The internal ground floor layout of the Manor House is broadly the same as the existing one, except alternations within the north-west and south-west ranges of the House. There is no objection in principle to the removal of the existing toilet areas within the south-west range. Proposals in the original submission, which would have resulted in the loss of the windows facing into the courtyard, including the one along the north-west range, to create a new full-length opening, and which would have resulted in permanent loss of built fabric of interest, have been omitted. This is welcomed.
- 9.15 The Council's Conservation Officer has raised no objection to the proposed removal of the existing partitions within the western corner of the House as it would reinstate the proportions of the room along the north-west elevation and facilitate the relocation of the toilet areas. There are also no objections to the removal of the toilet fittings within the north-east range and the demolition of the existing service yard walls to the north of the Manor House.
- 9.16 The proposal comprises the creation of new openings into the toilet area and the insertion of a small stud partition into the kitchen area. Both works would constitute some loss of existing built fabric, but it is considered to be acceptable in principle.

Upper Floors

- 9.17 There is no objection to the removal of the existing toilet area within the west range at the first floor of the House.
- 9.18 While upper floors are proposed to be converted into bedrooms associated to the proposed hotel use, the Council's Conservation Officer has raised significant concerns about the proposed subdivisions as they have not had sensitive consideration for the existing layout of the House. Amendments to the original submission have addressed previous concerns about the subdivision of some of the larger rooms along the south-east range, and the introduction of 'pod' bathrooms. Concerns regarding the loss of an internal view to a window in the west elevation have been addressed by alterations to the access to room 17.
- 9.19 However, there remain significant concerns about the subdivision of first and second floor rooms along the north-eastern range. There are also concerns about the subdivision of room 5 to form two ensuite bathrooms for adjacent rooms, because the existing fireplace would become an isolated feature within the room and the experience of walking into the space and viewing the gardens to the south would be entirely lost.

Grade II Listed Gatehouses

Eastern Gatehouse

- 9.20 The eastern gatehouse is the original gateway into the courtyard. The building is with the listed bridge leading to a narrow carriageway, featuring timber parallel doors. The building is two-storey in height and is split into two halves, comprising of three spaces at ground floor. The building also features a castellated parapet detail and small historic window openings, positively contributing to its character and a robust building, providing fortification to the moated area.
- 9.21 The proposal is seeking to remove the existing partition associated to the ground floor toilet area. There is no objection in principle to the proposal as there is no significant works to the building internally. It is noted that the building will be converted to storeroom and security office which will support the proposed hotel use.

Northern and Southern Gatehouses

- 9.22 The northern and southern gatehouses are of similar appearance and historically of the same form. They are constructed in a stock brick with stone dressing. The shallow pitched roof form is set behind a parapet save for a tower feature above the carriageway entrance which also include a castellated parapet. The southern gatehouse includes a clock tower with the castellated tower, though it is noted that the building has been internally altered and substantially extended since it was built. The northern gatehouse largely remains in its original built and plan form Timber double doors are located within the arched carriageway which provides access into the two sides of the building.
- 9.23 The proposal is seeking to convert the northern gatehouse to a spa facility. The Council's Conservation Officer has raised no objection in principle to the removal of the existing partitions and the staircase and the insertion of two new staircases as they are of modern construction. The proposed internal subdivision is considered to be acceptable in principle as it would amount to limited harm to the northern gatehouse. The proposal is seeking to introduce a steam room and sauna facility within the building. It is considered that the proposal would create a high moisture environment within the historic building.

Further details of how this high moisture environment can be controlled to prevent any adverse impact to the listed building are required but it can be conditioned in this regard.

- 9.24 The proposal is seeking to insert a glazed opening the west opening of the southern gatehouse. It is also noted that the majority of the works are within the existing rear extension, which is of no historic interest. Therefore, the proposed works are considered to be acceptable in this regard.

Chapel

- 9.25 The chapel building is considered to be within the curtilage of the Manor House. There is no objection in principle to the restoration and reconsecration of the chapel building as it would be a positive enhancement to the chapel building itself and the wider Ditton Park.
- 9.26 The submitted information sets out that chemical based solution would be used to resolve the existing damp issue. It is considered that such solution would not be supported from a conservation perspective. Further details should be provided to demonstrate why other solutions are not considered and the long-term solution to prevent the damp issue.

Public Benefit

- 9.27 Paragraph 20¹ of the Planning Practice Guidance (PPG) sets out that public benefits may follow from many developments and could be anything that delivers economic, social, or environmental objectives as described in the NPPF. Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits. Examples of heritage benefits may include:

- sustaining or enhancing the significance of a heritage asset and the contribution of its setting
- reducing or removing risks to a heritage asset
- securing the optimum viable use of a heritage asset in support of its long-term conservation

- 9.28 This listed building consent application is accompanied by an economic headline report, which is prepared by Volterra Partners, on behalf of the applicant. The statement sets out the economic, social and heritage benefits of the proposed development.

Economic Benefit

- 9.29 As part of the amendments, an updated Economic Headline Report has been submitted. However, the reasoning behind the increase in benefits, when compared to the originally submitted report, has not been explained. For completeness, the benefits from the originally submitted report and the amended report are summarised below:

¹ Reference ID: 18a-020-20190723

Economic Headline Report March 2023	Economic Headline Report November 2023
Creation of 305 job opportunities during the construction period	Creation of 380 job opportunities during the construction period
£330,000 local spending by workers during construction period	£515,000 local spending by workers during construction period
Creation of 130 full time job opportunities once operational	Creation of 130 full time job opportunities once operational
£56,000 local spending annually by workers once operational	£56,000 local spending annually by workers once operational
155 additional indirect full time jobs, 60 of which estimated to be taken by residents in the borough	155 additional indirect full time jobs, 60 of which estimated to be taken by residents in the borough
£8.7 million visitor expenditure per annum	£8.6 million visitor expenditure per annum
Additional tax revenues of between £1,400,000 and £1,900,000 , of which business rates payments of approximately £90,000	Additional tax revenues of between £1,100,000 and £1,500,000 , of which business rates payments of approximately £90,000
Other benefits to the local economy from the hosting and operation of events	Other benefits to the local economy from the hosting and operation of events

- 9.30 Given the proposals have not changed significantly as a result of the amendments, the rationale for the changes in economic benefits is not clear, for example it is not clear why the amendments would result in an increase from 305 to 380 construction jobs.
- 9.31 In terms of economic benefit, the economic benefit of the creation of 380 construction job opportunities is time limited. The proposed development will result in creating a net 130 full time equivalent additional job opportunities. It will help support the labour market in general. The proposed development will result in a £8.6 million visitor expenditure per annum, which is a considerable amount of income to the local economy. The proposed development will result in additional tax revenues including business rates payment. Though it is a considerable amount of additional tax revenues, it is to comply with the legislation only. The existing site is already operating and hosting events. The proposed development would also lead to a considerable loss of spaces for conferencing (i.e., from 5,123 sqm to 1,193 sqm). Overall, **moderate** weight is afforded to the economic benefits associated with the proposals.

Social Benefit

- 9.32 The applicant's headline report sets out that the proposed development would provide a new community facility to replace the existing dated scout hut building at the site. The applicant is also engaging with the local cricket club to provide cricket facilities within the site. The proposed development would also open up the site grounds to the public and improve accessibility to the Manor House. The applicant's planning statement also sets out that there is a social benefit in opening the gym and chapel building for community use.
- 9.33 In terms of social benefit, the provision of the community building is to mitigate for the loss of the existing scout hut that would be displaced by the development. While there is a social benefit in opening the gym and chapel building for community use, how this will operate is not clear as no such details are provided in this application. **Very limited** weight is afforded to this benefit. There is already permissive access through the site,

but it is acknowledged that there would be a social benefit in more extensive public access, and this is afforded **limited weight**.

- 9.34 No details have been provided in this application related to the provision of an onsite cricket facility for the local cricket club and it is not clear what and where the facilities would be provided within the site. It is also considered that such facilities can be separately provided. **No weight** is afforded to this benefit.

Environmental Benefit

- 9.35 The proposed development will provide a biodiversity net gain of 216.14%. The provision is above the 10% national requirement that is mandatory for planning applications submitted after 12th February 2024. **Limited** weight shall be afforded to this benefit in this regard.

Heritage Benefit

- 9.36 Paragraph 6.1.6 of the applicant's heritage impact assessment suggests that there are a number of heritage benefits which can be identified in the proposed development as below:

- the refurbishment of Manor House would result in a low heritage benefit, as the building would be used in a manner consistent with its conservation with the involvement of minimal impacts;
- the physical works to the north stable block would preserve the significance of the building.
- the proposed accommodation block would preserve the setting of Manor House and would result in a small enhancement to the setting of the western elevation of Manor House;
- the proposed gym facility would not harm the significance of the parkland or the listed buildings;
- the introduction of a new marquee and a car parking area would result in a low benefit to the significance of the parkland and the settings of the listed buildings; and
- the proposed community building to the north of the parkland would not harm the significance of the parkland.

- 9.37 The assessment made by officers of the impacts of the development does not result in a conclusion of heritage benefit. Some of the benefits listed relate works considered as part of the application for planning permission. Notwithstanding, for the reasons outlined above and in section 9v. of the committee report addendum (Appendix 2) it is concluded that there would overall be harm to the Grade II Listed Manor House (and to its setting), and to the Grade II Registered Park and Garden.

- 9.38 Consideration has been given to whether the proposed development, and the long-term use that it would secure, could be considered a heritage benefit to which weight should be given. It is understood that the existing use of the site as a conference facility is currently a viable use, without the net additional harm that would result from the proposed development. Furthermore, for the reasons outlined above, the proposed change of use involves elements (both internal changes to the house requiring listed building consent, and external changes requiring planning permission) that are overall harmful to the designated heritage assets, and while it is considered that conversion to a hotel and wedding venue that would result in less harm may be possible, the proposals

as currently presented suggest that the use as proposed would be harmful. Officers therefore do not consider this to be a heritage benefit.

9.39 In addition to the works summarised in the HIA, a Parkland Restoration and Management Plan is proposed, which would be intended to facilitate the restoration of some elements of the landscaped parkland which are currently in a poor condition. However, the PRMP would not cover the whole of the parkland, being limited to the part of the site broadly north of the access road and moated area. Officers afford this **limited weight**.

9.40 The HIA proposes a programme of heritage research and recording work, and the implementation of an interpretation strategy as part of the proposals, which it is suggested could be secured by condition. Aspects of recording would be required where historic fabric would be lost, to mitigate for that loss. Regarding wider research and interpretation, given the lesser known history of the intelligence use of the park by the military, and to the extent that this would not take place without the development, this would be afforded **limited weight**.

10. CONCLUSION

10.1 Insufficient information is submitted to provide details of the upgrade works for the proposed conversion of the Manor House. While the proposed hotel use is acceptable in principle, the proposed subdivision of rooms would result in harm to the listed building.

10.2 The harm is **less than substantial**. While a number of public benefits can be identified from the proposed development, the public benefits **do not** outweigh the less than substantial harm caused by the proposed development. The proposed development therefore is contrary to Section 16 of the National Planning Policy Framework (NPPF) and Policy HE1 of the Borough Local Plan 2013-2033. The development would fail to preserve the listed buildings and so would be contrary to Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, which is a higher duty.

11. APPENDICES TO THIS REPORT

- Appendix – Plan and elevation drawings

12. RECOMMENDATION

Refuse listed building consent with the following reasons

- 1 The proposed development is harmful to the significance of the listed buildings. Though a number of public benefits can be identified from the proposed development they cannot outweigh the less than substantial harm caused by the harm to the significance of the listed Manor House. The proposed development is therefore contrary to Section 16 of the NPPF and Policy HE1 of the Borough Local Plan 2013-2033, and Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.