

43-45 Bloomsbury Square, London, WC1A
2RA
Planning Statement
On behalf of Holborn Links Limited

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1 Executive Summary

- 1.1 The proposal involves the change of use from Class B1 use to dual Class B1 and Class D1 use and associated internal and external alterations to the existing buildings at 43-45 Bloomsbury Square.
- 1.2 The application for planning permission proposes:-
“the change of use of the buildings from Class B1 use to dual use Class B1 and Class D1”
- 1.3 The application for listed building consent proposes:-
“internal and external alterations associated with the refurbishment of the buildings”
- 1.4 The buildings are located on the south side of Bloomsbury Square. Bloomsbury Square is located between Bloomsbury Way to the south and Great Russell Street/Bloomsbury Place to the north.
- 1.5 The applicant is Holborn Links Limited. The Holborn Links Estate comprises more than 50 buildings and is bounded by High Holborn to the south, Southampton Row to the east, Bloomsbury Square and Vernon Place to the north and Bloomsbury Court to the west. The Estate includes Southampton Place, Sicilian Avenue and Barter Street and comprises a mix of predominantly commercial uses including offices, shops and educational establishments, with some residential uses.
- 1.6 Nos. 43-45 Bloomsbury Square are Grade II listed and therefore defined as Designated Heritage Assets in accordance with PPS5. The buildings are located within the Bloomsbury Conservation Area. All three buildings are linked internally. The buildings are located within the Central London Area as identified in the London Borough of Camden Unitary Development Plan and the Central Activities Zone as identified in the London Plan (Consolidated with Alterations) 2008.
- 1.7 The buildings have been occupied in their entirety, by a single tenant, Carpmaels and Ransford for at least ten years. Carpmaels and Ransford have been in occupation of parts of the buildings for 20 to 25 years.
- 1.8 The buildings are no longer suitable for the tenant's modern occupational requirements and they are relocating from this building to the new office development which has recently been completed, by Holborn Links Limited at 125 High Holborn (now known as 1 Southampton Row).

- 1.9 The buildings on the site offer inflexible, outdated accommodation not suitable to modern office occupier requirements. There is limited demand for office floorspace of this sort within listed buildings.
- 1.10 The proposal for dual Class B1 and Class D1 use will ensure sufficient flexibility for use as either offices or an educational establishment to allow the buildings to come back into beneficial use once the existing tenants vacate and to secure its long term viable future.
- 1.11 The proposed alterations have been carefully considered to ensure that the special architectural and historic interest of the buildings as Designated Heritage Assets is preserved and where possible, enhanced. Modern, unsympathetic alterations such as partitions will be removed to restore the historic plan form of the building. New partitions are proposed to be introduced, where these have been removed, at second and third floor level to restore the historic plan form.
- 1.12 No. 45 Bloomsbury Square is proposed to be separated from the other buildings and retained as an individual building which is a significant benefit in historic building terms and will enhance the significance of the Designated Heritage Asset.

2 Introduction

- 2.1 Holborn Links Limited (herein after referred to as "the applicant") is bringing forward a proposal for 43-45 Bloomsbury Square (referred to as "the site").
- 2.2 This planning statement is submitted in support of the applications for planning permission and listed building consent for the site.
- 2.3 Planning permission is sought for:-
"the change of use of the buildings from Class B1 use to dual use Class B1 and Class D1".
- 2.4 Listed building consent is sought for:-
"internal and external alterations associated with the refurbishment of the buildings"
- 2.5 The buildings on the site are Grade II listed. The buildings are located in the Bloomsbury Conservation Area. The listing description is attached at appendix 1.
- 2.6 The Holborn Links Estate comprises more than 50 buildings and is bounded by High Holborn to the south, Southampton Row to the east, Bloomsbury Square and Vernon Place to the north and Bloomsbury Court to the west. The Estate comprises a mix of predominantly commercial uses including offices, shops and educational establishments, with some residential uses.
- 2.7 This planning statement has been prepared by Gerald Eve LLP as planning consultants and should be read in conjunction with the other documentation submitted in support of the applications for planning permission and listed building consent.
- 2.8 In addition to this planning statement the application includes the following documents
- Application forms
 - Site location plan
 - Existing, demolition and proposed plans
 - A Photographic Survey
 - A Design and Access Statement/Scope of Works Justification
 - Draft Travel Plan
 - BREEAM Pre-Assessment
 - Energy Statement
 - A letter from Carpmiels and Ransford dated 12 March 2010

3 Site and surrounding area

- 3.1 The application site is located on the south-east corner of Bloomsbury Square.
- 3.2 The site covers approximately 0.059 hectares.
- 3.3 The site is located approximately 100 metres from Holborn Underground station which is served by the Central and Piccadilly lines. Chancery Lane, Tottenham Court Road and Russell Square underground stations are all located within 500 metres of the site. High Holborn runs from east to west, to the south of the site and is served by numerous bus routes.
- 3.4 The site itself comprises 2,671.50 square metres of floorspace throughout the three buildings. The buildings comprise six floors (basement, ground, first, second, third and fourth floors).
- 3.5 The buildings are arranged as a terrace of three Victorian houses and were constructed towards the end of the eighteenth century and have been occupied by Class B1 offices uses for at least 25 years.
- 3.6 The buildings are listed Grade II (a listing description for all the properties is attached at appendix 1) and are located within the Bloomsbury Conservation Area.
- 3.7 The area is characterised by a mix of uses including a strong presence of offices along Southampton Place, High Holborn and Bloomsbury Square and a number of shops, educational uses and some residential uses.

4 Planning History

- 4.1 The statutory planning register held by the London Borough of Camden has been inspected.
- 4.2 In terms of the lawful use of the buildings there are no applications which relate to the use of the building, however, the ratings lists for 1995, 2000 and 2005 describe the buildings as offices and premises.
- 4.3 It is understood that the current tenant, Carpmaels and Ransford, have occupied some of the buildings since approximately 1985 and have occupied all the buildings for at least ten years. As a result it is considered that the lawful existing use of the building is as offices falling within Class B1 use.

5 The proposal

- 5.1 As set out in Section 2 of this planning statement, the proposal involves the change of use of the buildings on this site from Class B1 use to dual use Class B1 and Class D1.
- 5.2 Class E of Schedule 2, Part 3 of the Town and Country Planning (General Permitted Development) Order 1995 (as amended) states that a change of use between a use permitted by a permission and another use specifically permitted by that permission does not require planning permission, so long as it is within 10 years of the grant of permission.
- 5.3 A summary land use table is set out below:-

Address	Existing (sqm) GEA Class B1 Use	Proposed (sqm) GEA Class B1/Class D1 Use
43 Bloomsbury Square	1174.7	1174.7
44 Bloomsbury Square	757.7	757.7
45 Bloomsbury Square	739.1	739.1
TOTAL	2,671.5	2,671.5

- 5.4 There is no increase in floorspace as a result of the proposal as the proposal involves a material change of use only and associated internal and external alterations.
- 5.5 The external alterations proposed have been kept to a minimum to preserve the significance of the buildings. These include the introduction of grills to the entrance to the pavement vaults and the introduction of a channel/rail for bicycles on the staircase from street level to basement level. It is not considered that planning permission is required for these works.
- 5.6 The proposed alterations have been carefully considered to ensure that the special architectural and historic interest of the building is preserved and where possible, enhanced. The internal alterations proposed include the removal of unsympathetic, modern partitions to restore the historic plan form of the building.
- 5.7 It is proposed to restore No. 45 Bloomsbury Square to its original layout as a single building.

- 5.8 Partitions will be restored at second and third floor levels of nos. 45 and 44 Bloomsbury Square to reinstate the historic plan form of the buildings.
- 5.9 The proposal will enable the existing buildings which are outdated for modern office occupier requirements to be refurbished for occupation by an educational establishment whilst retaining the flexibility to use the space for Class B1a purposes if demand arises.

6 Development at Southampton Row

- 6.1 The applicant has developed an office building at 125 High Holborn (including 9-10 Southampton Place, 121-125 High Holborn and 3-9 and 11-13 Southampton Row) following the grant of planning permission and Conservation Area Consent in August 2005. This development is now known as 1 Southampton Row.
- 6.2 The development proposed the demolition of the existing buildings at 9-10 Southampton Place and 3-9 Southampton Row and the demolition and redevelopment behind the facades of 121-126 High Holborn and 1 and 11-13 Southampton Row to provide new office and retail accommodation together with associated plant, servicing and parking.
- 6.3 This development provides 15,185 square metres of floorspace in total with 13,000 square metres of modern Class B1(a) office floorspace and 2,185 square metres of retail floorspace.
- 6.4 The building is currently being fitted out ready for occupation and the existing tenants of the application site, Carpmaels and Ransford, are proposing to relocate to the new office development at 1 Southampton Row.
- 6.5 A letter from Teacher Stern Solicitors confirming that the existing tenants of 43-45 Bloomsbury Square will be occupying the fourth and fifth floors of the building is attached as appendix 2.

Other developments in the area

- 6.6 There are also a number of other large office developments of which some are completed and others are under construction and proposed in the vicinity of the application site, that provide a substantial amount of modern office floorspace.

7 Relevant planning policy

- 7.1 Planning policy operates at three levels. At a national level, Central Government produces guidance in the form of Planning Policy Guidance Notes (PPGs), now known as Planning Policy Statements (PPSs). At a regional level the Mayor's Consolidated London Plan was adopted in February 2008 and is the strategic development plan for London. The Mayor published the Draft Replacement London Plan in October 2009 as a consultation draft. The Examination in Public for the consultation draft is due to be held in late 2010. At a local level, policy is contained within the Unitary Development Plan. Camden's Core Strategy was submitted to the Secretary of State in January 2010 along with the Development Policies proposed submission document. Other Supplementary Planning Guidance Notes (SPGs) are also produced by London Borough of Camden.
- 7.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the statutory development plan unless material considerations indicate otherwise.

National Planning Policy: Planning Policy Statement 5 "Planning for the Historic Environment" 2010

- 7.3 PPS 5 provides the Government's guidance on development affecting heritage assets including listed buildings.
- 7.4 Paragraph 7 states that the Government's overarching aim is that the historic environment and its heritage assets should be conserved and enjoyed. To achieve this, the Government's objectives include delivering sustainable development recognising that intelligently managed change may sometimes be necessary and to contribute to our knowledge and understanding of the past by ensuring that opportunities are taken to capture evidence from the historic environment, particularly where a heritage asset is to be lost.
- 7.5 Policy HE9.2 sets out policy principles guiding the consideration of application for consent relating to designated heritage assets, including listed buildings. There should be a presumption in favour of the conservation of designated heritage assets and loss should require clear and convincing justification.
- 7.6 At HE9.2, where an application would lead to substantial harm to or total loss of significance, the LPA should refuse consent unless it can be demonstrated that:-

- i) the substantial harm to or loss of significance is necessary in order to deliver substantial public benefits that outweigh that harm or loss; or
- ii) a) the nature of the heritage the nature of the heritage asset prevents all reasonable uses of the site; and
 - b) no viable use of the heritage asset itself can be found in the medium term that will enable its conservation; and
 - c) conservation through grant-funding or some form of charitable or public ownership is not possible; and
 - d) the harm to or loss of the heritage asset is outweighed by the benefits of bringing the site back into use.

**Regional Planning Policy: The Consolidated London Plan
(February 2008)**

- 7.7 At a regional level, the Consolidated London Plan (February 2008) (hereinafter referred to as the London Plan) sets the relevant regional planning policy guidance for Camden and forms a component part of the statutory development plan.
- 7.8 The Site is located in the North London sub region and the Central Activities Zone.
- 7.9 The Mayor recognises that London is a city which has very distinctive strategic needs. His Plan has been designed to facilitate the continuing attractiveness of London as a World City.
- 7.10 The Central Activities Zone (CAZ) is home to many of London's world city activities, including international business and finance, government, culture and tourism. Though the CAZ is small in geographical and population terms, it contains nearly 30% of all of London's jobs and is projected to accommodate 36% of London's employment growth to 2026. The Mayor's objectives for the CAZ are to ensure adequate capacity to sustain future growth, to harness the opportunities that this offers for Londoners and the country as a whole and to secure and enhance its unique environment and attractiveness.
- 7.11 In respect of Higher and Further education, Policy 3A.25 states that the Mayor will and boroughs should ensure that the needs of the education sectors are addressed and this should include, promoting policies which are aimed at supporting and maintaining London's international reputation as a centre of excellence in higher education, taking account of the future development needs of the sector, including the provision of new facilities and potential for expansion of existing provision.

- 7.12 In respect of London's built heritage, Policy 4B.11 states that the Mayor will work with strategic partners to protect and enhance London's historic environment. Under Policy 4B.12 Borough's should ensure that the protection and enhancement of historic assets in London are based on an understanding of their special character. Policy 4B.13 relates to historic conservation-led regeneration and states that boroughs should support schemes that make use of historic assets.

Local Planning Policy

- 7.13 The relevant development plan is the London Borough of Camden Replacement Unitary Development Plan (UDP) adopted in 2006. A number of policies from the UDP have been deleted by a Direction of the Secretary of State. These policies expired on 26 June 2009 and are no longer used in determining planning applications. A revised version of the UDP containing all "saved" policies was published in June 2009.
- 7.14 Policy C1 relates to community uses and states that:-
- "the council will grant planning permission for the development of community uses in suitable locations. Facilities with a local catchment should be located close to, and/or be accessible to, the community that they serve. Facilities likely to attract large numbers of people should be located where they are easily reached by public transport and should be fully accessible to people with disabilities".**
- 7.15 With regards to the proposed educational use, Policy C1(c) relates to educational facilities and states:-
- "the council will grant planning permission for the development of education uses in line with policy C1A, provided that travel demand associated with the development would not harm the transport system. The council will seek to ensure that, where appropriate, educational facilities are made available for public use outside of term time or opening hours".**
- 7.16 The reasoned justification for this policy states at paragraph 8.8, that the Council "welcomes new facilities that do not have a harmful affect on local amenity, the environment and transport".
- 7.17 Paragraph 8.18 states that educational institutions play a significant part in London's role as an international centre for higher education and have an important influence on their surrounding areas. The paragraph goes on to state that the council will support the future growth of educational institutions in a way that is sensitive to its surroundings and maintains the amenity of existing residential communities.

- 7.18 Policy E2 seeks to retain existing employment floorspace and states that:-

“The council will not grant planning permission for development that involves the loss of a business use on a site where there is potential for that use to continue. The council will consider:

- a) whether the site is in or adjacent to the Industry Area**
- b) the size of the site and whether it could potentially provide for servicing by large vehicles**
- c) whether the site is particularly suitable for small firms;**
- d) the accessibility of the site by public transport and by service vehicles;**
- e) the relationship of the site to nearby land uses;**
- f) the demand, supply and variety of sites that are suitable for employment uses, firstly in that particular use class and secondly in business use in general;**
- g) the retention of design features that enable flexible use, including use for light industry as part of schemes for the redevelopment or alteration of industrial premises for B1 purposes.**

Where the Council considers that the site does not have potential for continuation of the existing business use, preference will be given to maintaining the site in an alternative business use, with a higher priority to retention of flexible space for B8 or B1 light industry than to provision of B1(a) offices. Where a site is not suitable for continuation of any business use other than B1(a) offices, as an exception to the general approach, the Council may allow a change to other uses. In such case, the Council will seek a change to permanent residential uses (in particular affordable housing) or community uses.”

- 7.19 The reasoned justification for this policy states that in order to maintain a range of business uses to match the needs, skills and qualifications of the Borough’s workforce and provide economic diversity, the Council seeks to retain land and buildings suitable for business use. In particular the loss of those sites in the Industry Area and sites that are over 1000sqm will be strongly resisted.
- 7.20 The need to retain business sites will be balanced against the availability of alternative sites; demand and supply of alternative sites will be taken into account.

7.21 Importantly, paragraph 7.22 states that there is a large stock of office floorspace in the Borough and it may not be suitable for conversion to alternative employment uses. Consequently proposals for other uses of older office premises will be encouraged in appropriate cases if they involve the provision of permanent housing and/or community uses.

7.22 With regards to the internal and external alterations proposed in association with the change of use Policy B6 relates to listed buildings and states:-

“To preserve or enhance the character of listed buildings as buildings of special architectural or historic interest, the Council will only grant listed building consent for:

- a) the total or substantial demolition of a listed building where exceptional circumstances are shown that outweigh the case of retention; and for**
- b) alterations and extension to a listed building where it considers this would not cause harm to the special interest of the building.**

The council will only grant planning permission for the change of use of a listed building where it considers this would not cause harm to its special architectural or historic interest. The Council will not grant planning permission for development that it considers would cause harm to the setting of a listed building”.

7.23 Paragraph 3.58 states that in order to protect listed buildings, the Council will control external and internal works that affect their special architectural or historic interest and character.

7.24 Importantly, paragraph 3.59 states that the best way of securing the upkeep of historic buildings is to keep them in active use.

8 Considerations

- 8.1 The key planning considerations which affect the proposed change of use of the buildings on the application site include the following:-

Land use

Education

- 8.2 In response to Policy C1, the proposed use of the building for dual Class B1/Class D1 use is considered appropriate. It is proposed that the building would be occupied by an educational establishment which is supported by Policy C1 which welcomes the development of community uses in suitable locations as these uses have a vital role in developing a skilled workforce.
- 8.3 The site is well located in terms of public transport and it is considered that the potential trips associated with the proposed use of the building by D1 uses will be easily accommodated by the public transport network.
- 8.4 The proposal will ensure that the amenity of the surrounding area is protected. The proposed use will operate between the hours of 8.00am and 8.30pm.
- 8.5 The buildings are located in a predominantly commercial area. There are very few residential uses in the vicinity of the property and it is considered unlikely that there will be any material impact on residential properties as a result of the proposal.
- 8.6 It is estimated that approximately 50 staff will be required to manage and run an educational establishment of this nature and as a result, the proposal is considered to represent an employment generating use akin to a commercial use in terms of operation and function.

Offices

- 8.7 In response to Policy E2, and with particular regard to the existing use of the buildings as offices, the proposal involves the change of use of the buildings to dual Class B1/Class D1 use. This will allow for flexibility as to how the building will be used within either of the two use classes and will enable the return of the building back to office use if demand arises.
- 8.8 In terms of the criteria set out within Policy E2, the site does not fall within or adjacent to the Industry Area and whilst the site is well located for public transport, given that the buildings are Grade II listed, they cannot provide for servicing by larger vehicles and would not be suitable for alternative uses falling within the B use class.

- 8.9 The site comprises 1,855 square metres of floorspace but as the buildings are listed (Grade II) the floorspace within the buildings is not able to provide flexibility for a variety of employment opportunities.
- 8.10 There are a significant number of new office developments in the vicinity of the site (including 1 Southampton Row) which provide large, modern, high quality and flexible office floorspace for a variety of employment opportunities and which is commensurate with modern occupier requirements. No. 1 Southampton Row is an office and retail development completed by the applicants which comprises 13,000 square metres of office floorspace in close proximity to the site.
- 8.11 The existing tenants who occupy the site are proposing to relocate to the new office development at 1 Southampton Row as the buildings at 43-45 Bloomsbury Square and 2 Southampton Place are no longer suitable for the tenant's modern occupational requirements.
- 8.12 There is a significant reduction in the demand for office floorspace within older buildings and particularly those which are listed and are not able to be altered to accommodate the requirements of office occupiers.
- 8.13 To this end, it is considered that there is a substantial availability in this area of alternative sites which provide significant amounts of modern and flexible office (Class B1) floorspace.
- 8.14 Policy E2 states that where a building is not suitable for continued business use, the Council may allow a change to other uses. It goes on to state that in such cases, the Council will seek a change of use to permanent residential use or community uses.
- 8.15 It is therefore considered that the change of use of the building from Class B1 use to dual Class B1 and Class D1 use is appropriate in accordance with Policy E2.

Conservation and Design

- 8.16 The Design and Access Statement/Scope of Work Justification Statement prepared by Canaway Fleming Architects sets out detailed information to explain the impact of the proposal on the significance of the listed buildings as designated heritage assets.
- 8.17 In accordance with PPS5 the proposed alterations will ensure that the significance of the building is sustained and where possible, enhanced.
- 8.18 It is not considered that there will be any harm to the significance of the buildings as a result of the proposals and the proposed alterations will enable the significance of the buildings to be enhanced through the removal of modern, unsympathetic additions.

- 8.19 In accordance with Policy B6, the proposed alterations have been carefully considered to ensure that there is no harm to the special interest of the building.
- 8.20 The restoration of no. 45 Bloomsbury Square as a single building is considered to be a significant benefit to the proposal as a whole.
- 8.21 The historic plan form of the building will be restored through the removal of modern partitions and the introduction of partitions at third and fourth floor where these have been removed.
- 8.22 The external alterations have been kept to a minimum and involve the introduction of grills on the entrance to the pavement vaults to enable the vaults to be successfully converted into cycle parking. External alterations also involve the introduction of a rail/channel adjacent to the external staircase from ground to basement level.
- 8.23 None of the proposed external alterations are considered to harm the special architectural or historic interest of the building.
- 8.24 Overall the proposed external and internal alterations associated with the change of use of the building are considered to comply with the policies set out within PPS5 and the UDP.

Sustainability

- 8.25 A BREEAM Pre-Assessment Report has been undertaken by Hurley Palmer Flatt in accordance with the requirements set out within the Camden Planning Guidance document dated December 2006.
- 8.26 This Report states that every attempt has been made to achieve the necessary credits but it recognises that as the buildings are listed this presents a considerable constraint to achieving a number of credits
- 8.27 With regards to energy, the Report confirms that all reasonable attempts to improve the energy efficiency of the building will be made
- 8.28 The report concludes that with all "achievable" credits targeted the building can achieve a Pass rating and if both "achievable" and "at risk" credits are met, then a BREEAM score of Very Good would be achieved. This is considered appropriate for buildings of this type.

Energy

- 8.29 An Energy Report has been undertaken by Hurley Palmer Flatt and assesses the appropriateness of the Low and Zero Carbon technologies outlined in the BREEAM assessment.
- 8.30 Based on the feasibility assessment undertaken, the report concludes that solar thermal and photovoltaic panels would be the only technology

that would be technically feasible for the building but that this is not appropriate given that the buildings are listed.

- 8.31 Other technologies including wind turbines, biomass heating, CHP and heat pumps were assessed but all were deemed inappropriate due to the constraints of the site and the building system.

Transport

- 8.32 A Draft Travel Plan has been prepared by Capita Symonds to accompany the applications.
- 8.33 The Draft Travel Plan offers a coordinated approach for the future Class D1 use occupier of the site. It promotes sustainable transport patterns and aims to reduce dependency of the private car.
- 8.34 The Draft Travel Plan has been formulated in the context of PPG13, the London Plan and TfL's Guidance for Workplace Travel Planning for Development (March 2008) document.
- 8.35 It concludes that the buildings are highly accessible and confirms that a number of measures and initiatives will be utilised to encourage sustainable travel awareness.

9 Conclusions

- 9.1 The proposed change of use of the buildings to dual use Class B1 and D1 will enable a flexibility of use of the existing floorspace within the building in accordance with and supported by both National, Regional and Local economic, community and mixed use policies.
- 9.2 The external and internal alterations proposed in association with the change of use are considered to be appropriate in the context of the listed buildings and the Conservation Area. The alterations have been carefully considered to ensure that the special architectural and historic interest of the buildings is preserved and where possible, enhanced.
- 9.3 The existing buildings provide old, outdated and inflexible accommodation which is not commensurate with modern office occupier requirements.
- 9.4 There is a substantial availability of modern, high quality and flexible floorspace in the vicinity of the site and there is very limited demand for the type of accommodation that can be provided by older, especially listed buildings.
- 9.5 This is supported by the relocation of the existing tenants, Carpmaels and Ransford, from the existing buildings to the new, high quality office development at 1 Southampton Row.
- 9.6 The increase in flexibility of uses within the building, will ensure that the buildings on the site will remain occupied which will secure their beneficial use and long term viable future.
- 9.7 Assessment of the proposal has concluded that the buildings are highly accessible by public transport and a Class D1 use on this site would not result in adverse impacts on residential amenity.
- 9.8 Assessment of the proposed alterations in historic building terms has concluded that the proposals represent a significant benefit to the buildings through their sensitive refurbishment.
- 9.9 The proposal is, therefore considered to be consistent with the strategic and local objectives for this part of the CAZ and the policies set out within national guidance provided in PPS5 in respect of the historic environment.