



1.3 This listed building consent application is accompanied by a full planning application (ref. 17/00655/FULM).

## **PROPOSAL**

1.4 The current proposals concern the enclosure on the west side of the track. This is a more informal open area for spectators, located adjacent to the home straight, where there are few permanent facilities for spectators, and where the original building housing the WCs, totes and refreshment kiosks is in poor condition. The proposals would affect the indicator board and clock-tower building, the associated linear structure on which it sits and the landscape around it. The following is proposed and considered in this application:

- The clock-tower building which has been redundant for a considerable time would be repaired, redecorated and reopened to visitors for guided tours. New safer access stairs are proposed.
- The two end sections of the six section linear building would be demolished and rebuilt in a different form to house new toilet facilities, and the rest of the structure would be consolidated structurally, repaired and made weather-tight.
- The existing all weather canopy added in the 1950s on the west side of the building would be removed and two new smaller canopies would be erected on top of the linear structure at each side of the indicator/clocktower building. These new canopies are considered in this application having the works have an impact on the external appearance of the listed building.
- A lift, two bars and four totes would be relocated under the new canopies.
- A new guardrail would be provided on top of the embankment, attached to the listed building.
- Improvements would be made to the curtilage listed turnstile buildings including modifications to six original turnstiles, the retention of two. in situ, repainting externally and internally and repairs to joinery.

## **RELEVANT PLANNING HISTORY**

1.5 The Racecourse has an extensive planning history. However in terms of the listed building consent application, only the following is of direct relevance: The following are of particular relevance:

- Planning permission and listed building consent granted on 19.04.2013 for the demolition of various buildings and the construction of new pre-parade ring and Winning Connections building and other associated buildings, replacement paths and landscaping (refs. 13/00090/FUL, 13/00091/CAC and 13/01187/LBC).

- On 08.10.2015, a planning application was submitted for the provision of two toilet blocks and public area within the undercroft canopy to course enclosure. However as the application was not supported by officers, it was withdrawn prior to determination (ref. 15/02250/FUL).
- Pre-application enquiries submitted in October 2016 and February 2017 relating to the current proposals (ref. 16/02464/PREAPP) and (ref. 17/00365/PREAPP).

## **2.0 POLICY CONTEXT**

2.1 See Section 4 for national and local policy context, as well as legislative context.

## **3.0 CONSULTATIONS**

### **INTERNAL**

#### Planning and Environmental Management (Conservation and Design)

3.1 The proposals are supported subject to the attachment of conditions. The proposals would not adversely affect the special architectural or historic interest of the buildings and there would be an enhancement of the setting and improvements in physical condition and appearance.

### **EXTERNAL**

#### Historic England

3.2 Historic England supports the application noting the excellent Heritage Statement. The proposals will enhance the structures, particularly the clock tower and indicator board and there is no objection to the demolition of sections of the linear wings. A condition is recommended requiring a record of the sections of the linear wings proposed for demolition.

#### Conservation Area Advisory Panel

3.3 The Panel is generally supportive of the proposals and welcomes the refurbishment of the clock tower building, the removal of the existing canopy, the provision of the new canopies which match those elsewhere and the new toilet blocks.

#### York Civic Trust

3.4 The Trust welcomes the repair of the Clock Tower. No new use is suggested in the application for the Clock Tower, beyond occasional guided tours, which is

understandable due to the infrequent use of the course enclosure. However there may be opportunities for access on Heritage Open Days?

### Various civic amenity bodies

3.5 The Twentieth Century Society, the Victorian Society, the Georgian Group, the Society for the Protection of Ancient Buildings, the Council for British Archaeology and the Ancient Monuments Society were all consulted but responses not received.

### Micklegate Ward Planning Panel

3.6 The planning panel supports the proposals.

### Neighbours:

3.7 Site notice expired: 03.05.2017 (posted in 4no. locations)

3.8 Yorkshire Evening Press notice expired: 03.05.2017

3.9 No neighbour responses received.

## **4.0 APPRAISAL**

### **KEY ISSUES**

4.1 The key issue is the impact on the special interest of the listed building.

### **LEGISLATIVE CONTEXT**

4.2 Section 16 of the Planning (Listed Buildings and Conservation Areas Act 1990 (as amended) ("the 1990 Act") requires the Local Planning Authority when determining applications for listed building consent to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

4.3 Case law has made clear that when deciding whether harm was outweighed by the advantages of a proposed development, the decision-maker must give particular weight to the desirability of avoiding such harm to give effect to its statutory duty under section 16 of the 1990 Act. There is a "strong presumption" against the grant of planning permission in such cases. The exercise is still one of planning judgment but it must be informed by that need to give special weight to the desirability of preserving the building. This means that even where harm is less than substantial, such harm must still be afforded considerable importance and weight in the overall planning balance, i.e. the fact of harm to the listed building is to be given more

weight than if it were simply a factor to be taken account along with all other material considerations. This is the case whether the harm is substantial or not.

## **PLANNING POLICY**

4.4 Section 38(6) of the Planning and Compensation Act 2004 requires that determinations be made in accordance with the development plan unless material considerations indicate otherwise. There is no adopted Local Plan in York. In the absence of a formally adopted local plan, the most up-to date representation of key relevant policy issues is the NPPF (other than the Saved RSS Policies relating to the general extent of the York Green Belt) and it is against this Framework and the statutory duty set out above that the application proposal should principally be addressed.

### National Planning Policy Framework

4.5 The National Planning Policy Framework 2012 (NPPF) sets out the Government's overarching planning policies. At its heart is a presumption in favour of sustainable development. However as paragraph 14 with footnote 9 advises, as the proposals relate to designated heritage assets, the presumption does not apply.

4.6 Twelve core planning principles are proposed at paragraph 17 including the need to conserve heritage assets in a manner appropriate to their significance. Further detail is at section 12 which states that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance. Great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Substantial harm should be exceptional and permission normally refused. Where it is less than substantial, then this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

### Other material considerations

#### Development Control Local Plan (DCLP 2005)

4.7 Although there is no formally adopted local plan, the City of York Draft Local Plan (incorporating 4th set of changes, April 2005), (DCLP 2005) was adopted for development control purposes in April 2005. It does not form part of the statutory development plan, but its policies are considered to be capable of being material considerations in the determination of planning applications where relevant policies relevant to the application are consistent with those in the NPPF. Policies considered to be consistent with the aims of the NPPF and most relevant to the development proposal include:

- CYHE4 Listed Buildings
- CYHE5 Demolition of Listed Buildings and Buildings in Conservation Areas

4.8 Policy HE4 explains that proposals for listed buildings must not have an adverse effect on the character, appearance or setting of the building. Policy HE5 states that consent will not be granted for the demolition of listed buildings and buildings in conservation areas if they make a positive contribution. It should be proved that the building is incapable of economic repair and there may be exceptional circumstances where demolition can be justified. The merits of alternative proposals for the site can be considered.

#### City of York Emerging Local Plan - Publication Draft

4.9 At this stage, policies in the 2014 Publication Draft Local Plan are considered to carry little weight in the decision making process (in accordance with paragraph 216 of the NPPF) particularly as the emerging Local Plan is to be the subject of further consultation and a revised publication draft is anticipated. However the evidence base that underpins the proposed emerging policies is capable of being is a material consideration in the determination of planning applications. The up to date evidence considered relevant to this application includes: the Heritage Topic Paper Update 2013 and the Racecourse and Terry's Factory Conservation Area Character Appraisal (2006) Relevant emerging policies include Policy D5 Listed Buildings.

### **CONSIDERATION**

4.10 Whilst the NPPF sets a presumption in favour of sustainable development, this presumption does not apply as the more restrictive heritage considerations take precedence. The legislative requirements of Section 16 of the 1990 Act are in addition to Central government policy contained in Section 12 of the NPPF. The NPPF classes listed buildings as “designated heritage assets”. The NPPF’s advice on designated heritage assets includes the following:

- Paragraph 129 says that Local Planning Authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including any development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.

- Paragraph 131 advises Local Planning Authorities to give significant weight to ensuring the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality and ensuring the

desirability of new development making a positive contribution to local character and distinctiveness.

-Paragraph 132 advises that “When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation. The more important the asset, the greater the weight should be” ... “As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification.”

-Paragraph 134 advises that “Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum use.”

- Paragraph 137 advises that local planning authorities should look for opportunities for new development within Conservation Areas and within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.

## **Significance of heritage assets**

4.11 Paragraph 129 of the NPPF states that local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset’s conservation and any aspect of the proposal.

## **Proposals**

4.12 The proposals include demolition of part of the listed linear building and rebuilding in a different form.

4.13 The over-arching aim of the project is to improve the visitor experience in the west enclosure by providing better and more convenient facilities, and by revealing the character of the historic buildings and enhancing their settings. The proposals should be considered in the wider context of major upgrade of facilities at the Racecourse, whereby redundant facilities have been removed, and the provision of exceptionally high quality buildings as replacements.

4.14 The need for the proposals to improve the course enclosure has become urgent as the linear facilities building is in an extremely poor condition due to dampness and decay and the kiosks are substantially empty and require partial

rebuilding as evidenced in the structural survey submitted. The indicator board/clocktower building has also been redundant for some time yet its moveable shutters and fittings are of great interest and the proposals would allow visitors into the building to see its historic workings. As existing facilities are substantially un-useable, on race days it is necessary to bring in numerous temporary facilities. They inhabit the west side of the course enclosure and are also placed on top of the sloping embankment. They clutter the site.

4.15 Protection from inclement weather is currently provided by the extensive steel canopy structure added in 1950s in front of Brierley's linear stone faced building. The canopy is a basic utilitarian structure which harms the setting of the linear stone wall and hides it from view.

### **Assessment of impact**

4.16 Proposals have been underpinned by a detailed Heritage Statement including a heritage impact assessment explaining the historical development of the course enclosure, and the characteristics and significance of the site and its component parts. The flood risk assessment and the structural condition report are of particular relevance to the linear building as they provide evidence to support the extent and nature of rebuilding and alteration. Specialist conservation advice has been provided by the Council's conservation architect during the consideration of the application, additional information provided and some amendments to the proposals as a result of discussions.

4.17 In assessing the proposals the conservation architect has confirmed that the significance of the building is the illustrative historic value of the purpose-built "totalisator" structures and for the aesthetic value of the architecture by an architect of renown. Taking each element of the proposals in turn, the officer has confirmed that, despite the removal/demolition of some elements of the listed building comprising the two end bays of the linear building and the removal of the 3rd flights of 'ladder' stairs in the Clock tower/indicator board, there is no harm to the special architectural or historic interest of the building. Historic England has reviewed the proposals, and similarly has not identified any harm to the listed building, highlighting the benefits of the proposals.

4.18 The opportunity is being taken by the applicant to rebuild the two end bays in a much better form to provide significantly enhanced WC facilities to meet current expectations and with larger capacity whilst responding to the original structure. The rebuilding enables the floor level to be raised above minimum data to prevent flooding and improve sanitary conditions. With the access raised slightly, the landscape is reformed at each end to appear natural but also to provide a ramped access into the building. The new end blocks will complement the existing architecture. The proposals will also facilitate the repair to the remaining four bays which also suffer structural decay but of a lesser extent. There is no change to the



external appearance of the four retained bays (being two-thirds of the original linear building) and it remains extensive at c180m in length.

4.19 Therefore whilst the Heritage Statement submitted by the applicant identified 'low adverse' impact resulting from the removal of these elements, this element is not agreed by the conservation officer, who underlines that there is no harm to the special architectural or historic interest of the building. The recording prior to demolition of the end bays is considered for posterity only.

4.20 Considering the component parts of the building in turn, the proposals are assessed as follows.

#### The Clock tower/indicator board

4.21 This building would be repaired and repainted and rusting of exposed parts of the steel frame would be arrested. Whilst there is no intention to make alterations to the building, there is a proposal to improve access into the three storey structure to enable groups of visitors to enjoy and better understand the original purpose of the building by seeing how it worked. The clock-tower sits over the central steps which give access to the roof of the stand below. The proposal is to exchange the existing steep ladder-like access for an ambulant staircase. Similarly inside the building several of the stairs will be replaced by more ambulant staircases. The impact of the new stairs would be reduced by making them in a steel and open mesh construction, and an example of an original stair will remain in the building. The entrance access stair will be most visible in the open undercroft below the building; however it would be visually light-weight in construction and it would oversail only one of the sets of steps where it would be set back below the face of the building.

4.22 The alterations would not affect the special significance of the structure and the changes are justified to enable safe access so that the special architecture and historic interest of the building would be better revealed to visitors who have not previously had access.

#### Long linear building

4.23 This building was designed as a thick hollow wall to house facilities such as WCs, totes and refreshment kiosks. It is divided into six sections by intermediate steps giving access to the viewing area above, and there are steps at each end. The structure acts as a retaining wall for the embankment which leaves only the West facing and end elevations visible. The exposed sandstone ashlar wall is sub-divided into equal bays, and the stonework is modelled with a plinth and also an implied entablature. The facade has been designed using a stripped classical language and its architecture is of interest.

4.24 The utilitarian steel canopy, which is slightly higher than the building, hides most of the facade. Proposals would remove it to reveal the facade. The loss of the canopy would enhance both the setting of the wall and the Clock tower/indicator board.

4.25 Two of the six sections of the linear block would be demolished to enable the end bays to be rebuilt in a different format. The semi-circular format proposed would allow an increase in area for the toilets to cope with larger capacity expected at major outdoor events, and most importantly it would enable the floor level to be raised above minimum data required to prevent flooding. This would create the sanitary conditions required. The semi-circular format would slightly reduce the length of the structure, but the form is required to enable the access to be positioned higher than the existing low lying datum with the landscape re-formed to appear natural when the new ramp is included. The new end blocks would be less characteristic of the existing linear form but their materials and design would compliment the existing architecture, and the remaining part of the building still represents two thirds of the previous structure and is extensive. The roof of the end blocks would be higher than existing by approx 900mm, and although more noticeable in the immediate landscape, in wider perspectives from the Knavesmire the increase in height would be immaterial. It would not be possible to reduce the height without putting the block back into a vulnerable position regarding flooding.

4.26 The linear building is suffering from damp and decay and this is causing structural problems. Asphalt weather-proofing on the roof has failed and water ingress, both from above and from pressure against the retaining wall, has caused the steelwork to rust and the concrete roof structure has "blown" in places. Parts of the structure, especially on the open corners, have moved, and the internal environment is damp with mould and decay. The structural report justifies the need to replace the roof as it is beyond repair. Investigative works will be undertaken to inform the rebuilding. As these do not affect the facade, listed building consent will not be required; however a method statement should be agreed to protect the exiting facade by limiting the extent of disturbance. Rebuilding should be covered through a condition. The proposed elevations show that there would be no change to the appearance of the remaining 4no sections of the building and therefore there would be no harm to the special architectural or historic interest of the building.

4.27 Due to their low level, restricted volume and lack of adequate tanking and ventilation it is not possible to reuse the lower kiosks and WCs, whilst complying with current health and safety standards, let alone visitor expectations. Therefore a minimum number of permanent amenities - totes and refreshment bars - would be relocated to the top of the embankment where two new canopies are proposed at each side of the clocktower. This would enable the poor quality all weather canopy on the west side to be removed. By relocating these few amenities onto the spectator embankment visitors will not be disadvantaged when viewing the course.

4.28 The indicator/clocktower building currently appears as a stand-alone structure on top of the embankment. By designing the two canopies as a symmetrical pair to each side of the building, the clock-tower building remains a focal point. The low height and ephemeral design of the canopies, i.e. almost as "floating structures" with space flowing underneath them, means that they do not compete with the dominance of the clock-tower or add uncharacteristic mass to the top of the mound. The bar, totes and platform lift housing would be set well back underneath the canopies. The limited size and open festive character of the canopies would reduce their prominence in relation to the clocktower. The proposals would compliment the character of the existing building, rather than harming it, and reinforce the festive character of the racecourse area.

### Railings

4.29 Existing utilitarian guarding on top of the linear building would be replaced by new higher guardrails for safety purposes. A detailed proposal has been submitted showing an improved design which would co-ordinate closely with the original bay structure of the building. The new balustrade would represent a minor enhancement of the building and its setting.

### Hardstanding

4.30 The new end blocks will receive a good quality artificial turf to reduce their impact. The proposals represent a minor loss of "live landscape" which in the size and context of the site would not harm the setting of the building. There will be a neutral effect overall.

### Turnstiles blocks and WC block

4.31 As these are curtilage listed they are included in this application. The turnstile blocks contain the original metal turnstiles but these are extremely narrow and prevent the clear flow of people through the entrances to the course enclosure. Proposals are that these are retained in site but modified to be housed beneath the staff desks. Two original turnstiles will be retained in the south block. The proposals can be supported.

## **5.0 CONCLUSION**

5.1 The over-arching aim of the project is to improve the visitor experience in the west enclosure by providing better and more convenient facilities, and by revealing the character of the historic buildings and enhancing their settings. This has become urgent and the existing linear building cannot be reused. The new end blocks housing replacement toilets, new canopies with bars, totes and lift, repainting and repair of the clock tower/indicator board and addition of new staircases, railings and upgrade of the turnstile buildings is all supported. The proposals would not

adversely affect the special architectural or historic interest of the buildings and there would be an enhancement of the setting and improvements in physical condition and appearance.

5.2 Specialist advice from Conservation and Design has confirmed that the proposals have either a neutral or positive impact on the listed building and its setting, including the Clock Tower/Indicator Board and particularly due to the removal of the steel canopy. The rebuilding of the two end bays using the existing blocks and the preservation of the remaining four, and the removal of the 3no. original staircases in the Clock Tower and retention of a fourth, would not cause any harm to the special architectural or historic interest of the building and is supported both by the Conservation and Design and Historic England. The new canopies on top of the embankment celebrate the festive character of the Racecourse and have been designed to be subservient and respond to the scale and design of the clocktower.

5.3 It is considered that cumulatively there are substantial and significant public benefits of the proposals. They include supporting the Racecourse as a business which contributes significantly to the York economy, the long term preservation and enhancement of a listed building, the removal of health hazards, improving visitor access to the Clock Tower to appreciate its original purpose and workings, making the course enclosure more accessible for less mobile patrons and families, and ensuring the facilities are much less likely to be damaged in flood events.

5.4 The proposals are therefore found to be in accordance with relevant policies and principles in the NPPF at section 12 Heritage Assets and DCLP policies HE4 Listed Buildings and HE5 Demolition of listed buildings. The application is thus recommended for approval subject to the attachment of the following conditions.

## **COMMITTEE TO VISIT**

### **6.0 RECOMMENDATION:** Approve

1 TIMEL2 Development start within 3 yrs (LBC/CAC)

2 The development hereby permitted shall be carried out in accordance with the following plans and other submitted details:-

Site location plan PA45-P-001 received 20.03.2017

Demolition site plan PA45-P-005 received 20.03.2017

Demolition elevations - PA45-P-008 received 20.03.2017

Turnstile blocks, north and south, plans and elevations as pre-works - 140 Rev A - received 22.06.2017

Proposed site plan lower ground floor - 201 - received 22.06.2017  
Proposed site plan upper ground floor - 202 - received 02.06.2017  
Proposed site plan roof plan - 203 - received 22.06.2017

New toilet block floor plan - North - 205 - received 07.06.2017  
New toilet block floor plan - South - 206 - received 07.06.2017  
Proposed floor plans retained clock tower - 215 - received 02.06.2017  
Proposed elevations - New toilet block north - 222 - received 07.06.2017  
Proposed elevations - New toilet block south - 223 - received 07.06.2017  
Proposed Elevations - retained Clock Tower - 228 - received 22.06.2017  
Proposed elevations - 229 - received 22.06.2017  
Cross section - New toilet block - 230 - received 07.06.2017  
Proposed cross section - 238 - received 22.06.2017  
Turnstile blocks - North and south, plans and elevations as built - 240 revision B - received 22.06.2017  
Proposed bar elevations - 301 revision C - received 02.06.2017  
Railing details (1:50) 302 revision A - received 08.06.2017  
Proposed bar elevations 303 revision A - received 08.06.2017

Heritage Statement - updated - Issue 3 received 22.06.2017  
Recommendations in the Structural Inspection by Blackburn Wigglesworth & Associates dated 10.03.2017

Reason: For the avoidance of doubt and to ensure that the development is carried out only as approved by the Local Planning Authority.

3 Prior to the commencement of development, samples of all new external materials shall be provided to and approved in writing by the local planning authority. Materials shall include samples of all the building materials, canopies and any other fixed structure including totes and bars and also the final colours and finishes of all manufactured items and paintwork. s. The development shall be carried out in accordance with the sample materials so approved. The canopy colour shall match the external painted colour finish of the clocktower building.

Reason: To agree the materials prior to construction to protect the special character and setting of the listed building and conservation area.

Note: Because of limited storage space at our offices it would be appreciated if sample materials could be made available for inspection on site. Please make it clear in your approval of details application when the materials will be available and where they are located.

4 Prior to the commencement of development, samples of hard landscape materials shall be provided to and approved in writing by the local planning authority. These shall include paving materials, steps, handrails, guarding, drainage channels and artificial turf. The development shall be carried out in accordance with the details so approved.

Reason: To agree the materials prior to construction to protect the special character and setting of the listed building and conservation area.

Note: Because of limited storage space at our offices it would be appreciated if sample materials could be made available for inspection on site. Please make it clear in your approval of details application when the materials will be available and where they are located.

5 Prior to development commencing, a photographic and drawn record of the sections of the linear wings proposed for demolition and their context in the wider building shall be prepared and a report produced which shall be approved in writing by the local planning authority prior to any work commencing on this part of the building. The record shall accord with Historic England's guidelines set out within 'Understanding Historic Buildings: A guide to good recording practice', republished in May 2016. The record should be lodged in the local Historic Environment Record within three months of its acceptance by the local planning authority.

Reason: To retain a record of the special interest of the listed building. This is required prior to the commencement of development to ensure the record is made before this part of the building is demolished.

6 Prior to the relevant part of the development commencing, large scale details of the following items shall be submitted to and approved in writing by the local planning authority:

- New staircases and security screens serving the clocktower
- A sample bay of the new toilet structures to be shown in plan, elevation and section to illustrate the detailed modelling of the facade and coping. The details of the facade have been designed to be similar to the existing architecture and existing drawings show a high level of detail.
- Final details of the canopy structure if different from that of the Moët structure
- New balustrades/handrails (including plinth walls) and any additional information relating to the replacement guarding

The development shall be carried out in accordance with the details so approved.

Reason: To protect visual amenity and the character and design of the listed building.

7 Before any repairs are carried out a schedule of repairs with illustrative details showing proposals for repairing and reconstructing the retaining wall and roof of the linear building shall be submitted to and approved in writing by the Local Planning Authority. The said repairs shall be carried out in accordance with the approved details.

Reason: To ensure the preservation of the special character of the listed building.

8 Before any repairs are carried out a schedule of repairs with illustrative details showing proposals for repairing the indicator board/clocktower building shall be submitted to and approved in writing by the Local Planning Authority. The said repairs shall be carried out in accordance with the approved details.

Reason: To ensure the preservation of the special character of the listed building.

9 In accordance with the plan 240 revision B 'Turnstile Blocks North and South', the 2no. original turnstiles in the centre of the southern block shall be retained in situ, without adaption, in perpetuity and the remaining 6no. adapted turnstiles with arm removed shall also be retained in situ in perpetuity as shown on the above mentioned plan, unless otherwise agreed in writing with the local planning authority.

Reason: To protect original features of the curtilage listed building which are key to the character of the building as a building of special interest.

**Contact details:**

**Author:** Sophie Prendergast Development Management Officer

**Tel No:** 555138