Applicant: Mr D Toombes Agent: Mr Liam Lunn-Towler

Peter Humphrey Associates Ltd

10 Market Street, Wisbech, Cambridgeshire, PE13 1EX

F/YR21/1096/F

Conversion of existing basement storage area to create a dwelling (1-bed studio flat) (retrospective)

F/YR21/1097/LB

Internal and external works to a listed building to convert existing basement storage area into a dwelling (1-bed studio flat)

Officer recommendation: Refuse

Reason for Committee: Referred by Head of Planning on advice of Committee Chairman

1 EXECUTIVE SUMMARY

- 1.1. This application is a retrospective application to seek planning permission and listed building consent for the conversion of an existing basement storage area to create a 1-bed studio flat at 10 Market Street, Wisbech. The property is a grade II listed terrace within Wisbech Conservation Area.
- 1.2. Owing to the basement location, the changes will not be visible in the street scene and as such the proposal is not considered to impact the overall visual amenity of the area or that of Wisbech Conservation Area. However, in spite of the proposals being acceptable with regard to external appearance, any harm to the designated grade II listed heritage asset, owing to the alterations, must also be considered.
- 1.3. The materials and method of tanking the basement are inappropriate, and may cause issues of condensation and 'rising' damp to floors above, which may result in considerable harm to the overall structure of the grade II listed building. Furthermore, the submitted Heritage Statement was considered insufficient as it did not outline the public benefit achieved by the scheme that would outweigh the harm caused to the building through its conversion by inappropriate means. The Conservation Officer recommended refusal of the scheme in this regard.
- 1.4. Moreover, owing to the limited natural light ingress and lack of visibility due to obscured outlook, the conversion has resulted in poor residential amenity for the occupant. The Environmental Health Team, Public Sector Housing Team and Wisbech Society all objected to the scheme owing to the resultant poor quality accommodation.
- 1.5. The below assessment deems the proposal to be in contravention with the relevant policies of local and national planning policy and as such the recommendation is to refuse the applications.

2 SITE DESCRIPTION and PROPOSAL

- 2.1. The application site is located within the built framework of Wisbech and within Wisbech Conservation Area. The property in question, known as 10 Market Street, is a grade II listed terrace (with Nos. 8 & 9) positioned on the corner of Market Street and Castle Mews. The ground floor is currently utilised as a beauty room/nail bar, with upper floors utilised as residential accommodation.
- 2.2. This application is a retrospective application to seek planning permission and listed building consent for the conversion of an existing basement storage area to create a 1-bed studio flat.
- 2.3. Full plans and associated documents for these applications can be found at: https://www.fenland.gov.uk/publicaccess/

3 SITE PLANNING HISTORY

F/YR03/1139/F	Change of use from Estate Agents to	
	Wine Bar	19.01.2004
F/YR04/3025/LB	Internal and external alterations to existing	Granted
	building	15.04.2004

4 CONSULTATIONS

4.1. Conservation Officer (FDC) – Original comments received 09.11.2021

This application concerns works to a listed building to enable a change of use of a cellar/basement storage area to residential accommodation. The application is retrospective, and the works are therefore currently unauthorised. No. 10 Market Street, is grade II listed, and designated as a terrace with No.s 8 and 9. Together they form part of the Castle Estate Development dating from 1793 – 1816 and were originally residential, though there is a long history of varying business and commercial use throughout the Castle Estate Development.

Consideration is given to the impact of the proposal on the architectural and historic interests with special regard paid to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses according to the duty in law under S16 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Consideration is given to the impact of the proposal on the architectural and historic interests of a listed building with special regard paid to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses according to the duty in law under S66 Planning (Listed Buildings and Conservation Areas) Act 1990.

Consideration is given to the impact of this proposal on the character and appearance of Wisbech Conservation Area with special attention paid to the desirability of preserving or enhancing the character or appearance of that area according to the duty in law under S72 Planning (Listed Buildings and Conservation Areas) Act 1990.

Comments are made with due regard to Section 16 of the National Planning Policy Framework, 2021, specifically, paragraphs 8 195, 197, 199, 200, and 202. The following comments are made:

Due regard is given to relevant planning history, which includes changes of use and associated advertising or cctv installation.

A heritage statement has been submitted with the application. The information is insufficient to comply with paragraph 194 of the NPPF and policy LP18 of the 2014 local plan.

The principle of the application is not objected to. However, the following comments are made:

- i. The use of UPVC windows is wholly unacceptable in a listed building. The fact that they are not visible from a public viewpoint is not a material consideration. The use of traditional materials in a traditional manner is part of what sustains the significance and architectural and historic interest of these buildings. The use of modern materials would dilute and erode these significances and is therefore not supported. Therefore, this application should be amended to ensure the windows are replaced with timber windows, of a style and detailing which is in keeping with the character of the building. There is no indication or evidence as to the style or age of the timber window that has been removed without consent, so level of harm cannot be assessed.
- ii. Similarly, the use of plasterboard and floor tiles in a basement are equally modern and in nearly all circumstances, equally unsuitable. There is no indication or evidence here as to the original wall or floor finishes, so again, it is uncertain as to the level of intervention and harm that may have been caused here. If lime plaster to the walls has been lost, this would amount to considerable harm, and should have been replaced or repaired on a like for like basis. If no finishes survived to the walls or floors, it would be unadvisable to apply these modern finishes, because they could trap moisture and lead to poor living conditions with potential for mould and condensation. Should there be a flood or leak, these materials will not allow moisture to evaporate and can therefore lead to rot in the timbers. However, these finishes are essentially removeable and reversible.
- iii. Comments with regards to the suitability of this space as living accommodation due to natural light and access, egress and space for storage and waste will be deferred to colleagues.

The proposed use for residential is supported. However, insufficient information has been submitted to allow an assessment of the impact of the works that have been carried out. Furthermore, potentially inappropriate methods have been proposed (plasterboard etc) and unacceptable materials have been used (upvc).

Therefore, this application should be resubmitted with further information to help assess the impact, and to amend the inappropriate and unacceptable elements of this application.

CONDITIONS

Samples of Materials

i. Photographic evidence of all external facing materials including the bricks used for infill have been submitted to or inspected on site by the Local Planning Authority's Conservation Officer, or representative and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details and thereafter retained.

Reason: In order to preserve the special architectural and historic character of the listed building and/or in accordance with the provisions of the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) and Policy LP18 of the Fenland Local Plan 2014.

Mortar Mixes and Brick Bonds

ii. Details of mortar mixes and brick bonds shall be submitted to and agreed in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details and thereafter retained.

Reason: In order to preserve the special architectural and historic character of the listed building and/or in accordance with the provisions of the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) and Policy LP18 of the Fenland Local Plan 2014.

Window Cross Sections

iii. Cross section drawings at a scale no smaller than 1:5 and elevation drawings at a scale no smaller than 1:10 of all new windows and doors, including details of glazing, glazing bars, sills, lintels and finish shall be submitted to, and agreed in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details and thereafter retained.

Reason: In order to preserve the special architectural and historic character of the listed building and/or in accordance with the provisions of the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) and Policy LP18 of the Fenland Local Plan 2014.

RECOMMENDATION: Refuse in current form/seek amendment.

4.2. Conservation Officer (FDC) – reconsultation comments received 09.12.2021

There is no objection to the principle of the application. However, concerns remain with regards to the methods undertaken during the conversion.

There are three main methods to make cellars and basements habitable and all require a thorough understanding of the issues involved in making an underground, or partially underground space habitable, and careful execution of the work to be successful.

Ventilated dry lining would be one option or option installing a drained cavity system would be another option.

Tanking is the third option and employs a waterproof material to seal the walls and floor totally and of all the systems, this is probably the most invasive and the most likely to cause problems in the longer term, as there is a danger that the hydrostatic pressure from water in the surrounding subsoil may force the tanking layer off, or ground moisture may be driven up the masonry to the ground floor. Condensation can be particularly problematic and ventilation is vital.

The design and access statement now states that the walls were brick with a lime plaster finish, which has now been removed without consent and a tanking slurry has been applied to the walls. Tanking slurry is advertised as a waterproof material, so it does not follow that once this has been applied, the walls remain breathable. It certainly does not follow that they would remain breathable (e.g. able to evaporate moisture) once a sand and cement render has been applied as a finish coat, as is the case here.

I am therefore extremely concerned that an inappropriate method has been employed to convert this basement - one that is not easily reversible, and one that may cause issues of condensation if there is insufficient ventilation, and 'rising' damp to ground floors by the forced movement of moisture upwards in the building.

It is not a method I would have advised and therefore I do not feel that I can recommend its approval, when there are alternative, less invasive and more easily reversible options. It is extremely regrettable, that conservation advice was not sought, or a pre-application enquiry submitted, prior to the execution of these unauthorised works.

Furthermore, whilst the joinery details for the proposed reinstated timber window appear appropriate in and of themselves, the information supplied leaves all options with regards to glazing bars, and profiles undetermined. I would suggest that a lambs tongue moulding and glazing bar profile would be most appropriate for the age of the property.

Due to the lack of clarity with regards the details of the window joinery, and the inappropriate method of tanking the basement, I do not feel that I can recommend approval for this application.

4.3. Environment & Health Services (FDC)

I refer to the above application for further consultation.

This service advised in our last consultation dated 12th October 2021, the Environmental Health Team had 'No Objections' to the proposed development as it was unlikely to have a detrimental effect on local air quality, the noise climate, or be affected by ground contamination.

We maintain this stance but would like to add further comment about the thermal efficiency and acoustic comforts required of a residential property that this application seeks to create.

We would advise that such a conversion is likely to require enhanced thermally insulted glazing, sufficient means of ventilation and finishing materials that will afford the future occupier a quality acoustic environment,

given the age of the structure to be converted, the location it is to be undertaken and the sensitive use that is required.

The above living provisions are considered essential if a quality and healthy environment is to be achieved. We would therefore recommend in the event planning permission is granted, the developer uses suitable building and finishing materials in the conversion to include the appropriate use of suitably designed glazing that is fit for purpose and provide the sufficient means of ventilation thus ensuring a healthy living environment is created.

As the property to be converted may be used by the rental market, it would be prudent for the local authorities Private Sector Housing Team to comment on this application.

4.4. Private Sector Housing (FDC) – Original comments received 21.10.2021

The Private Sector Housing Team have "no objections" to the above proposal but would make the following comments:

The lack of adequate natural lighting provision to this proposed residential accommodation may have the potential to cause harmful health affects to the occupants - all as assessed by The Housing Health & Safety Rating System (HHSRS). Any requests for an assessment of the housing conditions by the occupants will automatically factor in this consideration and there may be potential for Housing enforcement action to follow.

4.5. Private Sector Housing (FDC) – further comments received 02.02.2022

Expanding on our previous comment it is the Private Sector's Housing Teams opinion that the low levels of light that would be afforded to this property due to the number and size of windows, the fact the windows are facing northwest, the low level of the windows and the surrounding buildings. This is likely to be further exacerbated by the outlook afforded to the only view that offers a view which will be of a shared concrete yard. Within the building the light would only penetrate to the living area through the doorway between the kitchen and living room but this will be severely limited. As fire doors are required to the kitchen, even though the proposal has glass panels these will still further reduce light due to them have self-closure devices fitted.

It is of our opinion that this would be a significant defect when assessed under HHSRS for the lighting hazard. This would result in the likelihood of harm increasing to any person living there. Most notably depression and psychological effects caused by the lack of natural light and the outlook. However, as we have not physically assessed this flat we are not able to provide a full assessment.

It is of our opinion that this is likely to be a breach of Paragraph [130](f) of the National Planning Policy Framework and the Fenland Local Plan which identifies the need to create high quality environments that offer high levels of residential amenity thereby facilitating the health and wellbeing of residents within the district.

4.6. The Wisbech Society

With reference to the above Planning Application, the Wisbech Society OBJECTS to the application, for the following reasons:

- 1. Retrospective Planning Applications under the 'Town & Country Planning Act 1990, section 73A, involving major changes/change of use should be discouraged as they give the impression that the approval will be granted as a 'fait accompli' as much, if not all, of the conversion works have already been carried out. The Applicant should be clear of the risk and costs involved in undertaking such works without prior planning consent.
- 2. The 'standard materials' proposed/used in the conversion are not appropriate for a listed building. Basements are liable to flood or rising damp. The use of modern plasterboard or floor tiling will only exacerbate moisture ingress into the walls due to reduced breathability, leading to damp and mould/mildew development and increased danger to the buildings structure and human health.
- 3. There is very limited access to natural light and none in the lounge/bedspace. The plans seem to show that the pre-existing window in the kitchen is below ground level.
- 4. The use of white UPVC windows is inappropriate for listed buildings. Traditional materials and styles or suitable substitutes should be enforced.
- 5. Has appropriate consideration been given to additional space required for additional waste bins and parking for the additional tenant(s)?
- 6. There is no provision for egress from the lounge/bedspace in the event of fire or smoke occurring in the kitchen.
- 4.7. **Wisbech Town Council** That the application be supported
- 4.8. Local Residents/Interested Parties no comments received

5 STATUTORY DUTY

- 5.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires a planning application to be determined in accordance with the Development Plan unless material planning considerations indicate otherwise. The Development Plan for the purposes of this application comprises the adopted Fenland Local Plan (2014).
- 5.2. Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 require Local Planning Authorities when considering development to pay special attention to preserving a listed building or its setting and to the desirability of preserving or enhancing the character or appearance of a conservation area.

6 POLICY FRAMEWORK

6.1. National Planning Policy Framework (NPPF) July 2021

Para 2: NPPF is a material consideration in planning decisions.

Para 119: Promote effective use of land...while safeguarding and improving the environment and ensuring safe and healthy living conditions.

Para 124(e): the importance of securing well-designed, attractive and healthy places.

Para 130: Achieving well-designed places
Section 16 - Conserving and enhancing the historic environment

6.2. National Planning Practice Guidance (NPPG)

Determining a Planning Application

6.3. National Design Guide 2019

- C1 Understand and relate well to the site, its local and wider context
- I1 Respond to existing local character and identity
- H1 Healthy, comfortable and safe internal and external environment
- H2 Well-related to external amenity and public spaces
- L1 Well managed and maintained

6.4. Fenland Local Plan 2014

- LP1 A Presumption in Favour of Sustainable Development
- LP2 Facilitating Health and Wellbeing of Fenland Residents
- LP3 Spatial Strategy, the Settlement Hierarchy and the Countryside
- LP15 Facilitating the Creation of a More Sustainable Transport Network
- LP16 Delivering and Protecting High Quality Environments
- LP18 The Historic Environment

7 KEY ISSUES

- Principle of Development
- Character, Appearance and Heritage
- Residential Amenity, Health and Wellbeing
- Other Considerations

8 ASSESSMENT

Principle of Development

- 8.1. The application site is located within the Town of Wisbech, which is designated as a Primary Market Town within the settlement hierarchy set out in policy LP3 of the Fenland Local Plan where the majority of the development within the District is expected to take place over the plan period.
- 8.2. Policy LP2 seeks to ensure that development proposals offer the highest quality standards of health for Fenland residents. Policy LP16 supports the principle of development subject to the significance of, and the likely impact on, the amenity of neighbouring properties and users. Policy LP18 of the Fenland Local Plan 2014 seeks to protect and enhance heritage assets. The principle of development is therefore supported subject to the significance of and the likely impacts on the heritage assets and amenity.

Character, Appearance and Impact on Heritage

8.3. Policy LP16 of the Fenland Local Plan (2014) requires development proposals to deliver and protect high quality environments throughout the district. Proposals must demonstrate they make a positive contribution to the local distinctiveness and character of the area, enhancing their local setting and both responding to and improving the character of the local built environment whilst not adversely impacting on the street scene, settlement pattern or landscape character of the surrounding area.

- 8.4. Policy LP18 addresses matters concerning the historic environment within Fenland, noting that development proposals will be required to describe and assess the significance of any heritage asset, identify the impact of proposed works on its character and provide justification for those works, especially if they would harm the setting of the asset.
- 8.5. The proposal is for the retrospective conversion of a basement storage area to a 1-bed studio flat. The proposals will result in the reinstatement of the existing windows to the rear elevation to serve a kitchen and bathroom. The current installed windows are white uPVC. FDC's Conservation Officer considers the use of uPVC windows to be wholly inappropriate to preserve the historic character of the building. As such, the windows are proposed to be altered to timber windows to satisfy the requirements of the of the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) and Policy LP18 of the Fenland Local Plan 2014, subject to conditions (should permission be granted).
- 8.6. Overall, changes to the elevations are limited, with the changes to openings limited to the rear elevation. Owing to the conversion being in the basement of the building, these changes will not be visible in the street scene and as such the proposal is not considered to impact the overall visual amenity of the area or that of Wisbech Conservation Area, and thus can be considered compliant with Policies LP16 and LP18 with regard to design and character.
- 8.7. However, in spite of the proposals being acceptable with regard to its external appearance, any harm to the designated grade II listed heritage asset, owing to the internal alterations, must also be considered.
- 8.8. The Design and Access Statement submitted with the application states that the original basement walls were brick with a lime plaster finish, which has now been removed without consent and a tanking slurry applied to the internal walls, finished with a sand and cement render. These materials and method of tanking the basement are inappropriate, not easily reversible, and may cause issues of condensation if there is insufficient ventilation, and 'rising' damp to ground floors by the forced movement of moisture upwards in the building, which may result in considerable harm to the overall structure of the building.
- 8.9. The submitted Design and Access Statement did not offer sufficient justification relating to the choice of implemented methods to convert the basement storage area to a habitable space.
- 8.10. Furthermore, paragraph 200 of the NPPF states:
 - Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss;
- 8.11. The proposal is for the use of the intended flat as a marketable property for a private landlord, and will provide a 1-bedroom studio flat with limited

accommodation for 1-2 people. It is considered that, owing to the stipulations of Para 200, this does not equate to 'substantial public benefit'. Furthermore, the submitted Heritage Statement was considered insufficient as it did not outline the public benefit achieved by the scheme that would outweigh the harm caused to the building through its conversion by inappropriate means.

8.12. As such, the proposal is contrary to the requirements of Para 200 of the NPPF and, consequently, cannot be considered to comply with Policy LP18 owing to its impact on a grade II listed heritage asset.

Residential Amenity, Health and Wellbeing

- 8.13. The scheme includes no proposals to create additional windows or openings that will result in any additional overlooking potential to neighbouring dwellings. In addition, there will be no additions or changes in height that will result in any overshadowing potential. Thus, there are no issues to neighbouring residential amenity to reconcile.
- 8.14. Notwithstanding, it is necessary to consider impacts on occupant amenity, health and wellbeing in relation to Policies LP2 and LP16.
- 8.15. There are two windows within the property, both positioned on the west (rear) elevation. One window, serving the bathroom, is approximately 300mm x 500mm and obscure glazed with a central vent fan, set approximately 1.5m above ground level. Internal site inspection by the Case Officer revealed that this window is positioned within the shower cubicle in the converted bathroom. The second window, serving the kitchen, is approximately 700mm x 900mm and, owing to the reduced floor levels within the basement is set approximately 0.2m above ground level. Both windows face out toward the 1.8m walled external patio space.
- 8.16. Owing to the positioning of these windows, the enclosed nature of the patio space to which they overlook and the height and density of surrounding development, the ingress of natural light into these windows is very limited, which was observed during internal site inspection of the property by the Case Officer.
- 8.17. Thus, owing to the limited natural light ingress to the internal living space and lack of visibility due to their obscured outlook, the conversion has resulted in poor residential amenity for the occupant.
- 8.18. These concerns were also highlighted by the Environmental Health Team, Public Sector Housing Team and Wisbech Society who concluded that issues relating to the lack of light ingress are unable to be reconciled, and thus would result in poor quality accommodation.
- 8.19. Furthermore, owing to the inappropriate method of conversion of the basement (discussed above), the lack of sufficient ventilation may exacerbate issues relating to damp, e.g. mould or condensation, which may (in addition to potentially causing structural issues) cause additional impacts to occupant health and wellbeing.

8.20. Thus, given the above considerations, it is considered that the level of residential amenity afforded to occupants of the flat would be of sub-standard quality, in contravention of Policies LP2 and LP16 of the Fenland Local Plan and Paragraph 130 of the NPPF and not mitigated by the fact that the basement has already been converted for residential use.

Other Considerations

- 8.21. During site inspection the Case Officer observed that the flat would not offer parking for occupants of the flat, which would be in contravention of the parking requirements for new developments set out within Policy LP15.
- 8.22. Notwithstanding, owing to the site constraints, the town centre location of the flat and the level of accommodation within the proposed flat amounting to one bedroom, it would be unreasonable to justify a refusal of the scheme due to the under-provision of parking in this case.
- 8.23. The site lies within Flood Zone 1 and is an existing developed site with established drainage. Accordingly it is considered there are no issues to address with regard to Policy LP14.

9 CONCLUSIONS

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- 9.1. Current local and national planning policies including Policies LP2 and LP16 of the Fenland Local Plan seek to ensure the health and wellbeing of occupiers through the creation of high quality residential accommodation. This is supported by part (f) of Paragraph 130 of the NPPF that requires new developments to create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users.
- 9.2. Given the above, it is considered that the proposal for the retrospective conversion of the basement storage area to a 1-bed flat would result in poor levels of residential amenity due to the lack of natural light ingress and possible impacts from inadequate ventilation and/or moisture retention.
- 9.3. As such, it is considered the proposal is contrary to the requirements of both local and national planning policies and cannot be supported.

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- 9.4. Policy LP18 addresses matters concerning the historic environment within Fenland, noting that development proposals will be required to describe and assess the significance of any heritage asset, identify the impact of proposed works on its character and provide justification for those works, especially if they would harm the setting of the asset. Furthermore, paragraph 200 of the NPPF states where development will lead to substantial harm, local planning authorities should refuse consent, unless it can be demonstrated that substantial public benefits can be achieved that outweigh that harm or loss.
- 9.5. By virtue of the choice of inappropriate, and unauthorised, methods of conversion of the basement that could give rise to issues of damp which may detrimentally affect the fabric of the building and the lack of sufficient

justification relating to public benefits that may outweigh this harm, the proposal is therefore in contravention of the aforementioned Policies and should be refused.

10 RECOMMENDATION

F/YR21/1096/F - **REFUSE**;

F/YR21/1097/LB – **REFUSE**; for the following reasons;

F/YR21/1096/F

Policies LP2 and LP16 of the Fenland Local Plan and Paragraph 130 of the NPPF seek to ensure the health and wellbeing of occupiers through the creation of high quality residential accommodation. By virtue of the lack of natural light ingress; poor outlook from openings; poor ventilation that may give rise to issues pertaining to damp owing to the inappropriate, and unauthorised, method of converting the flat; and the potential detrimental impacts to health and wellbeing owing to these, it is considered that the proposal for the retrospective conversion of the basement storage area to a 1-bed flat would result in poor levels of residential amenity for its occupant(s). As such, the proposal is contrary to the requirements of the aforementioned local and national planning policies and cannot be supported.

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Policy LP18 requires that development proposals describe and assess the significance of any heritage asset, identify the impact of proposed works on its character and provide justification for those works, especially if they would harm the setting of the asset. Furthermore, paragraph 200 of the NPPF states Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss. By virtue of the choice of inappropriate, and unauthorised, methods of conversion of the basement that could give rise to issues of damp which may detrimentally affect the fabric of the building and the lack of sufficient justification relating to public benefits that may outweigh this harm, the proposal is therefore in contravention of the aforementioned Policies and should be refused.







