

Planning

Growth & Development

Delegated officer report for planning application

Application no. 140514/FO/2024

Date registered valid: 2 August 2024

Proposal: Change of use of a vacant retail unit to a bar / nightclub (Sui Generis).

Address: Unit 0A, 24 Mount Street, Manchester, M2 3NN

Ward(s): Deansgate Ward

Applicant: LHP Group Ltd

Agent (if any): Mr Michael Parham Broadgrove Planning and Development Ltd

Case officer: Danielle Cooper
Tel: 0161 234 1658
Email: danielle.cooper@manchester.gov.uk

Recommendation: Approve

Date of recommendation: 26/09/2024

Application details

Type of application: Full Application Consent

Development type: Change of use

Date of site visit: 12 August 2024

Standard consultations:

Printed: 9 August 2024 Expired: 31 August 2024

Neighbour notifications

Printed: 9 August 2024 Expired: 31 August 2024

Site notice

Posted: 12 August 2024 Expired: 3 September 2024

Press advert

Published: 13 August 2024 Expired: 3 September 2024

Departure from Development Plan: No

Environmental Statement: Not required

Description of site/building

Listed building: Not applicable

Conservation area: St Peters Square Conservation Area 1973

Tree Preservation Order: N/A

Description of area

The application site relates to part of the ground floor of Windmills Green. Windmill Green is a mixed-use, seven storey building previously known as London Scottish house prior to being redeveloped following planning approval in 2017. The upper five floors consist of office units, whilst the ground and first floors are retail. Adjoining the building to the North is the Grade II listed St George's House, to the east of the site is the Grade II* listed Midland Hotel, and to the South of the site is the Grade II* listed Manchester Central. Surrounding uses include public buildings, retail, food and drink, hotels, conference centres and offices. The property is sited within the St Peter's Square conservation area.

The proposal is for change of use of part of ground floor (Unit 0A) from retail (Use Class A1/A3) to a bar / nightclub (Use Sui Generis). The ground floor of Windmill Green currently comprises two retail units, referenced as Unit 0A and 0B. The application relates only to Unit 0A.

Description of development

Planning permission is sought to change the use of the vacant retail unit to a bar / nightclub (sui generis).

A bar / night club area, reception area, toilets, cloak rooms and an office will be provided within the existing unit.

The hours of operation are from 23:00 to 03:00 Friday to Saturday, and 23:00 to 02:30 on Sunday.

Internal alterations are proposed by inserting partition walls to provide separations between the proposed bar area, main club, VIP area, and the back of house.

No external changes are proposed.

The proposal will utilise the existing access points location on the Museum Street and Mount Street frontages. Museum Street will be the primary access point.

Consultations & Notification Responses

Highways – No objections

Environmental health – No objection subject to conditions

Greater Manchester Police – No objection subject conditions

CC Neighbourhood Policing – No response

The application was advertised by site notice, the press and neighbour notification letters.

One letter of objection has been received. The comments have been summarised below:

- Increased noise and anti-social behaviour into the late evening

Planning history

132565/FO/2021 - Installation of new external doors and high-level louvres within two ground floor elevations, in association with the use of the ground floor unit as offices – Approved 2022

132565/FO/2021 - Installation of new external doors and high-level louvres within two ground floor elevations, in association with the use of the ground floor unit as offices – Approved 2022

125452/FO/2019 - Change of use of part of ground floor (Unit 0A) from retail (Use Class A1/A3) to Bicycle Spinning Studio (Use Class D2) – Approved 2020

112455/FO/2016 - Partial demolition and reconfiguration of London Scottish House to create a new office building (Use Class B1) with retail uses (Use Classes A1, A3 or B1) at the ground and first floor, servicing and cycle parking, access and servicing arrangements and associated works – Approved 2016

Policy

The Adopted Core Strategy for the City of Manchester

Policy EN1 (Design Principles and Strategic Character Areas) advises that developer's will be expected to consider the City's heritage, including its listed buildings, conservation areas, archaeological remains and historic street pattern.

Policy EN3 (Heritage) advises that new developments must be designed so as to support the Council in preserving or, where possible, enhancing the historic environment.

Policy CC4 (Visitors, Tourism and Leisure) advises that development in the City Centre which improves facilities for visitors, including Manchester residents, will be promoted.

Policy CC7 (Mixed Use Development) advises that the City Centre presents the most viable opportunities for mixed-use development, and in general these will be promoted as a means of using land as efficiently as possible.

Policy CC9 (Design and Heritage) advises that development in Manchester should preserve or enhance the heritage assets affected.

CC10 (A Place for Everyone) states that development that promotes high standards of accessibility to buildings and across spaces in the City Centre.

Policy SP1 (Spatial Principles) advises that development in all parts of the City should protect and enhance the built environment.

Policy DM1 (Development Management) advises that all development should be appropriately sited, scaled, formed, massed and detailed with appropriate layout and materials and should have regard to the character of the surrounding area and effects on built heritage.

The Unitary Development Plan for the City of Manchester

Saved Policy DC10 (Food and Drink) advises that the Council will have regard to:

- a. the general location of the proposed development, including any reference to the area in other policies in the Plan;
- b. the effect on the amenity of neighbouring residents;
- c. the availability of safe and convenient arrangements for car parking and servicing;
- d. ease of access for all, including disabled people; and
- e. the storage and collection of refuse and litter.

Saved Policy DC14 (Shopfronts and Related Signs) advises on shop front works.

Saved Policy DC18.1 (Conservation Areas) states that the Council will seek to preserve and enhance the character of its designated conservation areas by carefully considering issues including the effect of signs and advertisements.

Saved Policy DC19.1 (Listed Buildings) advises that in determining applications for listed building consent the Council will have regard to the desirability of securing the retention, restoration, maintenance and continued use of such buildings and to protecting their general setting. The City Council will:

- Not permit any external or internal alteration or addition to a listed building where in its opinion, there would be an adverse effect on its architectural or historic character.

Saved Policy DC26 (Development and Noise) states that the Council intends to use the development control process to reduce the impact of noise on people living and working in, or visiting, the City.

Places for Everyone -

The Places for Everyone Plan is a Joint Development Plan Document, providing a strategic plan and policies, for nine of the 10 boroughs which make up Greater Manchester.

The following policies are considered relevant to this application.

Policy JP-J 1 (Supporting Long-Term Economic Growth) States that a thriving, inclusive and productive economy will be sought in all our boroughs. There will be an emphasis on

maintaining a very high level of economic diversity, facilitating the development of high value clusters in prime sectors, making the most of major assets of the sub-region, grasping the economic opportunities from the global transition to a low carbon economy, providing the high-quality, sustainable living environments that will help to attract and retain skilled workers, supporting local job growth, maximising the potential of the key growth locations whilst also securing investment that raises the competitiveness of our northern boroughs to deliver inclusive growth across the sub-region.

Policy JP-P 1 (Sustainable Places) aims to become one of the most liveable city regions in the world, consisting of a series of beautiful, healthy and varied places, each having the following key attributes that all development, wherever appropriate, should be distinctive, with a clear identity, visually stimulating, socially inclusive, resilient, adaptable, durable, resource efficient, safe, supported by critical infrastructure, functional and convenient, incorporating accessibility, legible easy to move around, well connected, comfortable and inviting, incorporating high quality and well managed green infrastructure and public realm, well served by local shops, services and amenities.

Policy JP-P 2 (Heritage) aims to proactively manage and work with partners to positively conserve, sustain and enhance its historic environment and heritage assets and their settings. Opportunities will be pursued to aid the promotion, enjoyment, understanding and interpretation of heritage assets, as a means of maximising wider public benefits and reinforcing Greater Manchester's distinct identity and sense of place. The policy requires development proposals affecting a designated heritage asset (or an archaeological site of national importance) and a conservation area to conserve those elements which contribute to its significance including those identified in any conservation area appraisal as making a positive contribution to the area. Harm to such elements will only be permitted where this is clearly justified and outweighed by the public benefits of the proposal.

National Policy

Sections 16, 66 and 74 of the Listed Buildings and Conservation Areas Act 1990 requires that special consideration is given to the preservation of the significant fabric and setting of listed buildings and conservation areas. Development decisions should, therefore, accord with the requirements of the NPPF and to section 16 (Conserving and Enhancing the Historic Environment).

It is a fundamental requirement of the NPPF that planning proposals contribute to the achievement of "sustainable development". In order to meet this key planning objective, in this instance, the development should sustain and contribute to the stimulation of a thriving historic environment.

Paragraph 196 states that in determining planning applications, local planning authorities should take account of:

(a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation.

(b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring.

(c) the desirability of new development making a positive contribution to local character and distinctiveness; and

(d) opportunities to draw on the contribution made by the historic environment to the character of a place.

Paragraph 200 advises that local planning authorities should require an applicant to submit sufficient information to describe the significance of any heritage assets affected, including any contribution made by their setting.

Paragraph 203 states that in determining applications, local planning authorities should take account of:

(a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation.

(b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and

(c) the desirability of new development making a positive contribution to local character and distinctiveness.

Paragraph 207 advises that any harm to or loss of a designated heritage asset should require clear and convincing justification. Substantial harm or loss should be exceptional and substantial harm to or loss of designated heritage assets of the highest significance, including grade I and II* listed buildings should be wholly exceptional.

Paragraph 208 states 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 viable use.

Section 12 (Achieving Well Designed Places) advises that the government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.

Issues

Principle of development

The application seeks a change of use to create a new (Sui Generis) bar / nightclub. The unit is located on Museum Street, which is located just off of Peters Street which is a popular dining and drinking destination in the heart of Manchester's city centre. Therefore, it is considered that there is an established precedent for this type of use located close to the application site as there are a number of other drinking establishments currently operating. The development would help contribute to the local offer, creating additional choice for both locals and visitors.

The nature of the use would also help contribute to the local economy. This is considered acceptable pursuant to policy CC1 which seeks the provision of a range of economic development uses in the city centre and its fringe and C10 which supports development which supports the evening economy and contributes to the vitality of district centres.

Given the above, the proposed change of use is considered acceptable in principle. However, there are amenity considerations, including visual, noise and fumes and odours that require consideration, together with the practicalities of accessibility, servicing and refuse management. These matters are explored further below.

Impact on visual amenity

No external changes are proposed and as such there will no impact on visual amenity of the host building, surrounding listed assets or conservation area. Internal alterations are proposed only, with the erection of partition walls in order to create a reception area, toilets, cloak rooms and an office.

Advertisement consent will need to be applied for if any branding/signage is required.

As such the proposal is considered to be visually acceptable, in accordance with Core Strategy Policies SP1, EN1, EN3 and DM1, saved UDP policies DC18 and DC19, and guidance contained within the National Planning Policy Framework.

Residential Amenity and the amenity of surrounding occupiers -

This is a critical issue, as amongst other things, it examines the impact that the scheme would have on nearby and adjoining occupiers. It includes the consideration of issues such as impact on noise and disturbance. The Midland Hotel – located east, The Edwardian Manchester Hotel – located north/east and resident apartments at the Great Northern Tower – located south/west are the closest residential and hotel accommodation.

All conditions specified by Environmental Health which relate to delivery hours, external plant, and approved waste management strategy will be applied to the application with the exception of the condition relating to restriction of construction hours, which will instead be applied as an informative. This is because construction hours are controlled by the City Council's Environmental Health Service.

A noise assessment has been submitted alongside the application. Environmental Health have reviewed this report and consider the measures taken to acoustically insulate the building to be acceptable subject to a verification report to valid that work undertaken conforms with that within the noise assessment. This will be conditioned as prior to occupation of the development.

The proposed bar use could result in a change in comings and goings with these possibility being more frequent and comprising larger groups during the evening and night and there is the potential for there to be some disturbance associated with this. Whilst it is not possible to control such disturbance through the imposition of conditions it is considered to be reasonable to limit the potential for people congregating near to that accommodation at an unreasonable hour by limiting the hours of operation. However in doing so, there is a balance to be made which weighs up carefully the reasonable expectations of residents, the City Centre context and the aspirations for the area to continue to develop as a mixed use destination. The LPA recognises that the primary access into the unit is from Museum Street which is not located immediately adjacent any nearby residential or hotel accommodation. As such the LPA consider the following opening hours to be acceptable and will be conditioned as such:

Friday to Saturday 23:00-03:00, and 23:00-02:30 on Sundays.

Bins would be stored within the internal bin store for the building.

Given the above the proposals are considered to be in accordance with Policies SP1, CC4, CC7, and DM1 of the Adopted Core Strategy for the City of Manchester and saved policy DC26 of the Unitary Development Plan for the City of Manchester and policies JP-J 1 and JP-P 1 of Places for Everyone.

Crime and Disorder –

A Crime Impact Statement has been submitted and reviewed by Greater Manchester Police who support the document and recommend the details contained within the statement are conditioned to ensure the proposal will achieve Secured by Design accreditation pre-occupation.

Given the above the proposal is considered to be in accordance with policies SP1 and DM1 of the Core Strategy for the City of Manchester.

Highway Safety and Impacts -

The use is highly accessible by public transport with regular bus services, tram services and bus services located within walking distance of the development site.

The City Council as Highways Authority are satisfied that the development proposals will have little impact on network operations, as the level of trips generated is not anticipated to be dissimilar to that as existing. As with similar drinking establishments and restaurants it is considered the majority of trips to the building would be undertaken by customers arriving by Taxi, walking or via public transport and as such there is not a requirement for on-street parking.

The proposed bin storage location and details of the servicing and refuse collection has been provided and are considered satisfactory.

Secure cycle parking is provided within the wider mixed-use development of Windmill Green and can be accessed by employees from Museum Street as within the current arrangement on site.

Given the above the proposals are considered to be in accordance with Policies SP1, CC10 and DM1 of the Core Strategy for the City of Manchester.

Disabled Access -

Level access will be provided throughout the site, with an accessible WC located at ground floor also. A level access ramp is to be installed to the Mount Street elevation in order to allow level access throughout the main club area. As such the proposal is considered to be in accordance with policies SP1 and DM1 of the Core Strategy for the City of Manchester.

Representations

One letter of representation has been received, raising concern to increased noise and anti-social behaviour into the late hours of the evening.

As addressed within the impact on residential amenity section of this report, the proposed bar use could result in a change in comings and goings with these possibility being more frequent and comprising larger groups during the evening and night and there is the potential for there to be some disturbance associated with this.

However, given the city centre context and the aspirations for the area to continue to develop as a mixed use destination, along with the primary access into the unit being from Museum Street which is not located immediately adjacent any nearby residential or hotel accommodation. As well as environmental health reviewing the submitted noise impact assessment and are satisfied with the noise levels subject to a post verification report to be submitted to the Local Planning Authority. The LPA do not consider increased noise or anti-social behaviour to be of a concern to warrant the application to be refused.

Conclusion

Given the above, the proposed use is considered to be in accordance with policies EN1, EN3, CC4, CC7, CC10, SP1 and DM1 of the Core Strategy, saved UDP policies DC18, DC19 and DC26, and policies JP-J 1 JP-P 1 and JP-P 2 of Places for Everyone and guidance contained within the National Planning Policy Framework.

Other Legislative Requirements Equality Act 2010

Section 149 (Public Sector Equality Duty) of the Equality Act 2010 requires due regard to the need to: Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act and; Advance equality of opportunity between persons who share a protected characteristic and persons who do not share it. The Equality Duty does not impose a legal requirement to conduct an Equality Impact Assessment. Compliance with the Equality Duty involves consciously thinking about the aims of the Equality Duty as part of the process of decision-making.

Human Rights Act 1998 considerations

This application needs to be considered against the provisions of the Human Rights Act 1998. Under Article 6, the applicants (and those third parties, including local residents, who have made representations) have a right to a fair hearing and to this end the local planning authority must give full consideration to their comments.

Protocol 1 Article 1, and Article 8 where appropriate, confer(s) a right of respect for a person's home, other land and business assets. In taking account of all material considerations, including Council policy as set out in the Core Strategy and saved policies of the Unitary Development Plan, the Director of Planning, Building Control & Licensing has concluded that some rights conferred by these articles on the applicant(s)/objector(s)/resident(s) and other occupiers and owners of nearby land that might be affected may be interfered with but that that interference is in accordance with the law and justified by being in the public interest and on the basis of the planning merits of the development proposal. She believes that any restriction on these rights posed by the recommendation given is proportionate to the wider benefits of and that such a decision falls within the margin of discretion afforded to the Council under the Town and Country Planning Acts.

Recommendation: Approve

Article 35 Declaration

In assessing the merits of an application officers will seek to work with the applicant in a positive and proactive manner to seeking solutions to problems arising in relation to dealing with the application. In this instance this has included advice about the information required to be submitted to support the application and to address issues. This has led to an acceptable proposal.

Condition(s) to be attached to decision for approval

1) The development must be begun not later than the expiration of three years beginning with the date of this permission.

Reason - Required to be imposed pursuant to Section 91 of the Town and Country Planning Act 1990.

2) The development hereby approved shall have been carried out in accordance with the following drawings and documents:

The drawings referenced:

The Location Plan, Received 15/07/2024

Existing internal cycle parking, Received 17/09/2024

Proposed ground floor plan, Ref: A101 REV A, Received 26/09/2024

Supporting documents referenced:

Crime Impact Statement, Received 18/07/2024

Noise Impact Assessment, Ref: September 2024, Received 16/09/2024

Servicing and loading bay location, Received 02/08/2024

Servicing plan, Received 02/08/2024

Operational statement letter, Received 02/08/2024

Waste Management Proforma, Received 26/07/2024

Reason - To ensure that the development is carried out in accordance with the approved plans. Pursuant to policies SP1, CC1, CC4, EN1, T1 and DM1 of the Core Strategy, saved policies DC10, DC18.1, DC19.1 and DC26.7 of the Unitary Development Plan.

3) The development hereby approved shall not operate outside of the following hours:-

o 11.00 to 03.00 Friday to Saturday; and

o 11.00 to 02.30 Sunday

Reason - In the interests of residential amenity in these exceptional circumstances in order to reduce noise and general disturbance in accordance with saved policy DC26 of the Unitary Development Plan for the City of Manchester and policies SP1 and DM1 of the Manchester Core Strategy.

4) a) Externally mounted ancillary plant, equipment and servicing shall be selected and/or acoustically treated in accordance with a scheme designed so as to achieve a rating level of 5dB (LAeq) below the typical background (LA90) level at the nearest noise sensitive location. Prior to commencement of the use hereby approved the scheme shall be submitted to and approved in writing by the City Council as local planning authority in

order to secure a reduction in the level of noise emanating from the site. The scheme shall be implemented in full before the use commences or as otherwise agreed in writing by the City Council as local planning authority.

b) Prior to the operation of the scheme a verification report shall be submitted to and approved in writing by the City Council as local planning authority to validate that the work undertaken throughout the development conforms to the recommendations and requirements in the approved acoustic report. The report shall also undertake post completion testing to confirm that the noise criteria have been met. Any instances of non-conformity with the recommendations in the report shall be detailed along with any measures required to ensure compliance with the agreed noise criteria.

Reason - To minimise the impact of the development and to prevent a general increase in pre-existing background noise levels around the site, in accordance with policies SP1 and DM1 of the Core Strategy and saved policy DC26 of the Unitary Development Plan.

5) The scheme for the storage and disposal of refuse as detailed within the completed waste management proforma, received 26/07/2024 by the City Council as Local Planning Authority, shall be implemented as part of the development and shall remain in situ whilst the use is in operation.

Reason - In order to ensure adequate provision is made within the development for the storage and recycling of waste in accordance with policies DM1 and EN19 of the Core Strategy for the City of Manchester.

6) a) The premises shall be acoustically insulated and treated to limit the breakout of noise in accordance with the scheme within the Noise Impact Assessment, ref: September 2024, received 16/09/2024 by the City Council as Local Planning Authority. This scheme shall be implemented in full before the use commences.

b) Prior to commencement of the development a verification report shall be required to validate that the work undertaken throughout the development conforms to the recommendations and requirements in the approved acoustic consultant's report. The report shall also undertake post completion testing to confirm that acceptable criteria have been met. Any instances of non-conformity with the recommendations in the report shall be detailed along with any measures required to ensure compliance with the agreed noise criteria.

Reason - To safeguard the amenities of the occupiers of the building and occupiers of nearby properties, in accordance with policies SP1 and DM1 of the Core Strategy and saved policy DC26 of the Unitary Development Plan.

7) The development shall be carried out in accordance with the Crime Impact Statement, ref: 2024/0234/CIS/01 as received by the City Council as Local Planning Authority on the 18/07/2024.

Reason - To reduce the risk of crime pursuant to policies SP1 and DM1 of the Core Strategy and to reflect the guidance contained in the National Planning Policy Framework.

8) Deliveries, servicing and collections, including waste collections shall not take place outside the following hours: 07:30 to 20:00, Monday to Saturday, Sunday/Bank Holiday deliveries etc. are permitted the times shall be confined to 10:00 to 18:00

Reason - To safeguard the amenities of the occupiers of nearby residential accommodation and in accordance with policies SP1 and DM1 of the Core Strategy.

9) Prior to commencement of the development, the proposed level access ramp as shown on the proposed ground floor plan, ref: A101 REV A, received 26/09/2024 by the City Council as the Local Planning Authority shall be provided and remain in situ whilst the use of the development is in operation.

Reason - To ensure that satisfactory disabled access is provided by reference to the provisions Core Strategy policy DM1 and CC10.

Informatives

1) Fit out works shall be confined to the following hours unless otherwise agreed in writing by the City Council as local planning authority-

Monday - Friday: 7.30am - 6pm

Saturday: 8.30am - 2pm

Sunday / Bank holidays: No work

2) The applicant is advised that any requirements for licensing, hoarding / scaffolding and any associated temporary traffic management arrangements will need discussion and agreement with the council's Highways Applications and Network Resilience teams via Contact Manchester (Tel. 0161 234 5004) Email - highwaylicences@manchester.gov.uk.

Appendix 1 – List of consultees & neighbours notified

Highway Services
Environmental Health
Greater Manchester Police
GMP - CC Neighbourhood Policing

Second Floor, 24 Mount Street, Manchester, M2 3NX
Seventh Floor, 24 Mount Street, Manchester, M2 3NX
Sixth Floor, 24 Mount Street, Manchester, M2 3NX
Fifth Floor, 24 Mount Street, Manchester, M2 3NX
Fourth Floor, 24 Mount Street, Manchester, M2 3NX
Third Floor, 24 Mount Street, Manchester, M2 3NX
First Floor, 24 Mount Street, Manchester, M2 3NX
Ground Floor, 24 Mount Street, Manchester, M2 3NX
Amanda Cunliffe Part Third Floor, St Georges House, 56 Peter Street, Manchester, M2 3NQ
Part Second Floor, St Georges House, 56 Peter Street, Manchester, M2 3NQ
Unit 1 Part Fifth Floor, St Georges House, 56 Peter Street, Manchester, M2 3NQ
Part Fifth Floor, St Georges House, 56 Peter Street, Manchester, M2 3NQ
Second Floor, St Georges House, 56 Peter Street, Manchester, M2 3NQ
Fourth Floor, St Georges House, 56 Peter Street, Manchester, M2 3NQ
Red Star Part Third Floor, St Georges House, 56 Peter Street, Manchester, M2 3NQ
58 Peter Street, Manchester, M2 3NQ
Midland Hotel, Peter Street, Manchester, M60 2DS
22 Mount Street, Manchester, M2 3NX
24 Mount Street, Manchester, M2 3NX
Seventh Floor, St Georges House, 56 Peter Street, Manchester, M2 3NQ
St Georges House, 56 Peter Street, Manchester, M2 3NQ
PIZZAEXPRESS, Ground Floor, St Georges House, 56 Peter Street, Manchester, M2 3NQ
First Floor, St Georges House, 56 Peter Street, Manchester, M2 3NQ
Sixth Floor, St Georges House, 56 Peter Street, Manchester, M2 3NQ
Club Coliseum, Peter Street, Manchester, M2 3NQ

Appendix 2 – Planning constraints

Article 4 Direction - City Centre PD Restriction - Class B1(a) To C3
Article 4 Direction - Removal Of PD Rights Change Of Use From Class C3 To Class C4
Coal Authority - Development Low Risk - Name: DEVELOPMENT_LOW_RISK_AREA
Conservation Area - St Peters Square Conservation Area 1973
Area Team Boundary - Name: CENTRAL