
6. FULL APPLICATION – CONVERSION OF BARN TO RESIDENTIAL DWELLING AT HIGHLOW FARM HOUSE, HIGHLOW, HATHERSAGE (NP/DDD/1015/0969, P.6190, 421958 / 380117, 26/02/2016/AM)

APPLICANT: MR JC WAIN

Site and Surroundings

Highlow Hall is a grade II* listed building situated in open countryside between Abney and Hathersage. Between the Hall and the road stand a range of impressive gritstone barns, which are individually listed grade II. The red-edged application site includes the two grade II listed barns, their respective curtilage and a modern portal framed agricultural building to the north east.

The northernmost part of the listed barns has been converted to a four bedroom dwelling following the grant of planning permission and listed building consent (detailed in the history section of this report). Although the barns were originally built to serve Highlow Hall, they are now in separate ownership and known as Highlow Farm.

Access to the application site is via the adjacent highway which runs from Leadmill to Abney. The nearest neighbouring properties in this case are Highlow Hall, Highlow Cottage and Highlow Farm House all to the south of the site.

Proposal

This application seeks planning permission for the conversion of part of the listed barns on the application site to form a three bedroom dwelling. An application for Listed Building Consent has also been submitted.

The design and layout of the proposed conversion is the same as that refused planning permission and listed building consent by the Authority in 2014. Specifically, the application proposes the following:

- Stables and shippon on the ground floor converted to create sitting room, dining room and kitchen.
- New door formed in wall between shippon and stable at ground floor.
- Loft and store at first floor converted to create three bedrooms, each with an en-suite bathroom and landing.
- New door formed between loft and store at first floor and existing opening blocked up.
- Internal faces of the external walls would be lined.
- Existing single storey 'lean-to' store to be re-built to create utility room and toilet.
- Existing wall between shippon and barn to be re-built and new stair case installed to provide access to extended first floor which would be created by erecting a new cavity wall within the barn.
- Installation of new window to the proposed third bedroom.
- Installation of new window and door frames.

- Lowering of ground level outside the north east elevation of the building.

This application is also supported by a planning statement, heritage assessment and bat survey which seek to overcome the reasons for refusal given by the Authority in determining the previous applications in 2014.

RECOMMENDATION:

That the application be REFUSED for the following reason.

- 1. The proposed development would harm the significance of the grade II listed barn contrary to Core Strategy Policies GSP1, GSP3, L3 and HC1 and Local Plan policies LC4, LC6 and LC8. In the absence of any overriding public benefits it is considered that any approval would also be contrary to the National Planning Policy Framework.**

Key Issues

- Whether the proposed development is required to achieve the conservation or enhancement of the significance of the listed building in accordance with HC1.
- Whether the proposed development is acceptable in all other respects.

Relevant Planning History

There is a relatively long planning history related to various proposals and pre-application advice for the application building. The most relevant applications are listed below.

2006: NP/DDD/1204/1315: Planning permission granted conditionally for conversion of farm building into dwelling and holiday flat.

2008: NP/DDD/1207/1148: Listed building consent granted conditionally for restoration of barn and conversion to holiday flat and dwelling.

The northernmost barn has been converted to a dwelling in accordance with the above planning permission and listed building consent. Therefore these two permissions have been implemented and are extant. These permissions therefore represent a 'fall back' position which is available to the applicant which is a material consideration.

The approved plans show the stable and store at the ground floor unconverted and retained for their original use. A new utility room within the shippon was approved with the rest of the space retained for hay / tack storage. A new staircase was approved within the shippon to provide access to a two bedroom flat above.

The Authority's Historic Building's Architect undertook a site visit and gave detailed pre-application advice to the applicant and his former agent in 2012 in respect of a proposal to convert more of the building than was previously approved.

2014: NP/DDD/0214/0169 & 0170: Planning permission and listed building consent refused for conversion of existing agricultural building to form holiday accommodation. The reasons for refusal were:

- 1. The proposed development would substantially harm the architectural and historic significance of the listed building contrary to section 66 of the Town and Country Planning*

(Listed Building and Conservation Area) Act 1990, Core Strategy Policies GSP1, GSP3 and L3 and Local Plan policies LC4, LC6 and LC8. In the absence of exceptional circumstances outweighing the substantial harm that has been identified, any approval would also be contrary to the National Planning Policy Framework.

- 2. Insufficient evidence has been provided to allow the Authority to conclude that the proposed development would not harm local bat populations contrary to Core Strategy policy L2 and Local Plan policy LC17.*

Consultations

Highway Authority – No response to date.

District Council - The private water supply when risk assessed two years ago was very high risk and likely to be insufficient during drought periods. Even if improvements have been done, and there were a lot needed, the insufficiency will still be a problem.

Parish Meeting – Support the application. The parish meeting do not give any reasons why it supports the application, Officers have requested further comment by no response has been received to date.

Amenity Bodies – No response to date.

PDNPA Built Environment – Recommends refusal and makes the following comments:

This application is a resubmission of proposals which were refused consent in 2014, on the grounds that the proposed development would substantially harm the architectural and historic significance of the listed building (NP/DDD/0214/0169 and NP/DDD/0214/0170). The accompanying Structural Inspection Report was also as submitted with the 2014 application.

No alterations to the proposals have been made since the previous applications but a new Heritage Assessment, Rapid Building Appraisal produced by Archaeological Building Recording Services (ABRS) has been submitted. The aim of this report is to address the reasons for refusal in 2013. This concludes that later remodelling of the barn “has left little of the original plan form of the building” and the presumption is made that later additions are “of limited historical significance”. The Supporting Statement accompanying the application concludes that the proposed works will only impact on “non-original features” of the barn and that these works will therefore have a less than substantial impact on the building as a heritage asset.

There are a number of problems with both the ABRS heritage assessment and with the resultant conclusion. Firstly, the report does not provide an adequate assessment against the requirements of para 128 of the Framework: there is no clear statement of significance by which the key heritage value of the building can be understood, and against which the conversion proposals can be assessed. Secondly, the author appears to take a simplistic approach to understanding the building, in which ‘original’ fabric is assumed to be important but later additions and alterations are not. Thirdly, the report’s assessment of the building’s development and phasing, which is used to determine whether features are ‘original’ or ‘later’, is itself inaccurate.

The ABRS assessment directly contradicts a detailed archaeological assessment of Highlow Barn undertaken in 2002, “An Analysis and Assessment of The Threshing Barn and Neighbouring Outbuildings” by Historic Buildings Archaeologist Colin Briden. This earlier report was commissioned by the applicant on the recommendation of the Authority, English Heritage and the Council for British Archaeology: the purpose was to understand, in detail, the features which make up the special interest of the building and its development and phasing.

Inaccuracies in the ABRS assessment are as follows:

- 1. The report states that Highlow Barn has C17 origins and was originally built as a threshing barn with an attached cow shed to the north (now converted). However, the 'cow shed' is the earliest part of the range, its windows and symmetry of the elevations indicating an early mid C17 date; the threshing barn was added in the early C18, indicated by the plan of the barn and the detailing of the masonry of the openings, in particular that of the opposed wagon doors.*
- 2. The report states that the stable (south end of the range) and wall separating this from the rest of the building, and an overloft and granary above were added in the C19, whereas it is likely that the wall, stable and 3-bay first floor loft are contemporary with the construction of the threshing barn, despite the wall's butt joint with the east and west walls.*
- 3. The report states that the subdividing wall (to first floor only) between the threshing barn and later shippon (C18 to mid C19) is constructed from tooled stone window heads, an assertion taken from the submitted 2013 Structural Inspection Report. However, both Colin Briden and the Authority's Historic Buildings Architect agree that this wall is constructed from coursed, margin-tooled masonry typical of the period. Building internal cross-walls of large ashlar-sized blocks is a local tradition in the C19 according to the Authority's Historic Buildings Architect.*
- 4. The report states that the southernmost lean-to is a later addition with its C17 style windows likely to be re-used, and "lacks any significant historical or architectural features" internally. However, this is visible on the 1857 Chatsworth Estate map, the southernmost outshot is earlier (C18 – mid C19), and whilst this has windows that closely resemble those surviving in the C17 north range, the fixing of the window heads suggest that these were made to fit this structure rather than being re-used from elsewhere.*

Based on the above comments, it is considered that the combined impacts of the proposed development and the associated works would substantially harm the significance of the listed building, and I would reiterate the detailed reasons for refusal in 2014:

- 1. Converting the ground floor stable to create a domestic sitting room will harm the historic and architectural character of this part of the building, which should be retained for storage. John Sewell (NB. the then Historic Buildings Officer) noted that the stable retains a great deal of its original architectural and historic character, including an original stone flag floor and original massive beams supporting the first floor.*
- 2. A thorough assessment of what survives of historic significance in the feed passage and how it would be affected by the proposals is required: this has not been provided in the current application, which simply concludes that the feed passage is a "late insertion", the building of which "appears to have compromised" the "historic plan form of the building". Without this assessment, it is not possible to determine whether conversion of this part of the barn to create a dining room would harm the significance of the building.*
- 3. Erection of a new full height cavity wall closer to the threshing floor would fundamentally change the character of this space in a harmful manner, by significantly altering the plan form of the barn and reducing the size of the threshing barn. Colin Briden noted that original features remain within the barn, including the flagged threshing floor and some masons' marks.*

4. *Total rebuilding of the 'lean-to' would harm the significance of the building and would be unacceptable: the presumption should be that the walls and the historic C17 style openings need to be retained as they are, with localised repairs / strengthening as necessary. The Structural Inspection Report states that this structure is beyond repair but does not consider alternative repair strategies, nor whether the historic openings could be retained.*
5. *The subdivision of the upper floor into three bedrooms, each with an en-suite, would not reflect the open floor plan of the original building.*
6. *The replacement of an existing vent slot on the south-west elevation with a new window would further harm the existing architectural and historic character of the building, and would be unacceptable. Note, the ABRS report states that, "With the exception of renewing doors and windows...there will be no physical impact upon the external appearance of the barn": this is inaccurate.*
7. *The submitted plans show that the internal faces of the external walls would be lined: the lining of the external walls is unacceptable in a building of this quality.*

PDNPA Archaeology: Recommends refusal and makes the following comment:

The application is submitted with a heritage assessment by Archaeological Building Recording Services. With regard to built heritage significance I feel that this document does not provide an adequate assessment against the requirements of para 128 of the Framework. There is no clear 'statement of significance' by which the key heritage value of the building can be understood, and against which the conversion proposals can be assessed. The author appears to take a rather simplistic approach to understanding the building, in which the original 17th century fabric is assumed to be important but later additions and alterations are not. Although features like the 19th century feeding passage are acknowledged as 'interesting' there is no discussion of their significance with regard to local and regional comparators. If features are 'interesting' then presumably they are also significant. The document does not therefore clearly establish the significance of the heritage asset as required by the Framework, because of a lack of discussion of the later features and a lack of comparanda to provide context and justification for the conclusions drawn.

With regard to below-ground archaeology the heritage assessment does not contain an assessment of significance and impact and is therefore deficient against the Framework.

Because the application does not meet the heritage information requirements of the Framework I recommend that it should not be granted permission in its current form. To address these issues the applicant may wish to submit a fuller heritage assessment, to include:

- *A fuller consideration of built heritage significance, including fuller assessments of significance for later features, justified by reference to local and regional comparators, and leading to a clear 'statement of significance' against which the development proposals can be assessed and benefits harms quantified.*
- *An assessment of potential impacts to below-ground archaeology, including a digest of proposed below-ground impacts with detail of location, dimensions and depth.*

PDNPA Ecology: No response to date.

Representations

A total of four representations have been received to date. All four of the letters support the application. The reason for support given in all the letters is summarised below. The letters can be read in full on the Authority's website. The supporters consider that The proposed development will preserve the character of the farm buildings and will improve and help to preserve the existing buildings.

Main Policies

Relevant Core Strategy policies: GSP1, GSP3, DS1, L1, L2, L3 and HC1

Relevant Local Plan policies: LC4, LC6, LC8, LC17, LH1, LH2, LT11 and LT18

Policy

The National Planning Policy Framework (the Framework) is a material consideration in the determination of any planning application. Paragraph 115 within the framework says that great weight should be given to conserving landscape and scenic beauty in National Park which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage should be given great weight in the National Park.

Paragraph 115 cross refers to the Government Vision and Circular for English National Parks and the Broads (2010) which states explicitly that the Government considers that it is inappropriate to set housing targets within the National Park and that the focus should be the provision of affordable housing to meet local need.

Paragraph 55 of the Framework says that to promote sustainable development local planning authorities should avoid isolated homes in the countryside unless there are special circumstances such as (inter alia) where such development would represent the optimal viable use of a heritage asset.

This is the same approach taken by policy HC1 C which says that provision will not be made for housing solely to meet open market demand and that exceptionally new housing can be accepted where in accordance with GSP1 and GSP2 it is required in order to achieve conservation and / or enhancement of a valued vernacular or listed buildings.

Paragraphs 128 – 134 in the Framework are relevant for considering development which affects heritage assets. Appropriate evidence to describe the significance of any affected heritage asset should be required to inform decision making and local planning authorities should identify and assess the particular significance of any affected heritage asset taking into account available evidence and necessary expertise. This assessment should be taken 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.

Great weight should be given to the conservation of heritage assets within the National Park. 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. 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 there are exceptional circumstances. 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.

The Authority's conservation policies reflect the approach taken in the Framework. L3 and LC6 together says that development must conserve and where appropriate enhance or reveal the significance of heritage assets and their setting and that other than in exceptional circumstances, development will not be permitted where it is likely to cause harm to the significance of any cultural heritage asset.

LC8 says that conversion of a historic or vernacular building will be permitted provided that it can accommodate the new use without changes that would adversely affect its character and that the new use does not lead to changes to the building's character or require new access or services that would adversely affect its character or have an adverse impact on its surroundings. GSP3 and LC4 require the detailed treatment of development to be of a high standard which respects, conserves and enhances the landscape, built environment and valued characteristics of the area, paying special attention to scale, form, mass and orientation in relation to existing buildings, the degree to which design details reflect or complement the style and traditions of local buildings, landscaping and the amenity, privacy and security of the development and nearby properties.

L2 and LC17 require all development to conserve or enhance the biodiversity of the National Park and require adequate information to be submitted to allow the Authority to assess the potential impact of development upon statutorily protected sites, features of species of biodiversity importance.

LT11 and LT18 require development to be served by a safe access and have adequate parking and turning space.

It is considered that the relevant policies in the development plan are generally in accordance with the Framework because taken together these policies restrict the creation of new housing within the National Park unless there are special circumstances such that the development is required to achieve the conservation or enhancement of the National Park's cultural heritage. Therefore the relevant development plan policies should be afforded full weight in any planning decision on this application.

Assessment

Principle

For the purposes of the development plan, the application site is considered to lie in open countryside because of the considerable distance between the application site and Hathersage which is the nearest named settlement. In common with the Framework, the Authority's housing policies do not set targets for the provision of market housing or permit new isolated homes in the countryside unless there are special circumstances.

The proposed house is intended to meet general demand rather than any functional need or local need. Therefore, the special circumstances in which permission could be granted for the current application are set out in policy HC1(C) I of the Core Strategy.

HC1 C says that in accordance with GSP1 and GSP2, exceptionally, new housing (whether newly built or from re-use of an existing building) can be accepted where (I) it is required in order to achieve conservation and/or enhancement of valued vernacular or listed buildings. The supporting text to policy HC1 explains that occasionally new housing may be the best way to achieve conservation and enhancement where this could only be reasonably achieved by the impetus provided by open market values.

The application building is grade II listed and therefore is of national significance. The buildings appear to be in use as general storage and therefore due to the poor condition of the buildings and the likely level of investment to repair / re-instate the structure of the buildings, the impetus

of value from conversion of part of the building to a residential use is considered likely to be required to achieve enhancement to the heritage asset.

Therefore in principle it is considered that the conversion of the building to a market dwelling would be acceptable and in accordance with HC1 C provided that it can be demonstrated that the development would achieve the conservation and/or enhancement of the building in accordance with HC1, L3 and LC6.

There are no concerns that the proposed development would be unneighbourly due to the distance and relationship between the application building, the adjacent dwellings and nearby neighbouring properties. The proposed development would not affect existing parking or access arrangements and there is ample space for parking in the yard area to the south of the building in accordance with parking standards set out in the Local Plan.

The key issue in this case is therefore whether the proposed development would conserve the significance of the listed building along with the National Park's biodiversity. These were the principle reasons why the Authority refused planning permission and listed building consent for the same development and works in 2014. In considering whether to grant planning permission or listed building consent for the conversion the Authority is obliged 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.

Impact upon the Listed Building

The design and layout of the proposed conversion is unchanged following the refusal of planning permission and listed building consent in 2014. A new planning and heritage statement have been submitted in support of the current application.

Concern has been raised by both the Authority's Conservation Officer and Conservation Archaeologist in regard to the assessment and conclusions within the submitted heritage assessment. Having had regard to their advice, it is considered that the submitted heritage statement does not provide an adequate assessment of the listed building because there is no clear statement of significance by which the value of the building can be understood, and against which the conversion proposals can be assessed.

The heritage statement asserts that the original fabric of the building is important but that later additions and alterations to the buildings are not. No detailed explanation is given to explain why the report has reached this conclusion. It is also noted that the assessment of the building's development in the heritage statement (and upon which its conclusions are based) is considered to be inaccurate and contradicts previous analysis and assessment of the buildings carried out in 2002 and used to inform the applications approved in 2006 and 2008.

Having had regard to the advice from the Authority's Conservation Officer and Archaeologist it is considered clear that the submitted heritage statement does not provide an adequate assessment of the significance of the listed building which is a requirement of paragraph 128 of the Framework. It is therefore considered that in these circumstances very little weight can be given to the conclusions of the planning and heritage statements that the proposed development would not have any substantial impact upon the listed building.

Concerns remain from the determination of the 2014 applications that the submitted drawings do not include details in regards to the detailed construction of new or replacement walls or how the new openings for internal doorways and the proposed external window are to be formed (or the existing openings blocked up). The submitted plans also indicate that the internal faces of the external walls of the barn are to be lined, but no detailed specification has been submitted.

It is therefore considered that insufficient detailed information has been submitted with the application to allow the Authority to assess the effect of the proposed development upon the significance of the listed building contrary to policy LC6 (b) and the Framework.

The Authority's Historic Buildings Architect visited the site before offering pre-application advice to the applicant and his previous agent in 2012. He considered that the ground floor stable retains a great deal of its original architectural and historic character, including an original stone flag floor and original massive beams supporting the first floor. There is a feed passage between the stable and shippon and ground floor which could date from the C19. The rear 'lean-to' has a number of C17 openings and was split into two storeys, with the upper floor possibly used as a hen house. Similarly the two storey threshing barn is not converted and retains a great deal of its original character.

The current application again proposes to convert the whole of the ground floor of this part of the building including the stable and feed passage and proposes to re-build the existing wall between the shippon and threshing barn and extend into the threshing barn by erecting a new wall to provide a hallway and access into the 'lean-to' store at the ground floor and to create a landing at first floor.

Having had regard to the Historic Building Architect's advice (which is supported by the Conservation Officer's comments) it is considered that converting the stable to create a domestic sitting room would harm the historic and architectural character of this part of the building. No further evidence in regard to the significance of the feed passage has been submitted with the application and in the absence of this information, the Authority is also unable to conclude that the conversion of this part of the shippon to create a dining room would not harm the significance of this part of the building.

The erection of a new full height cavity wall closer to the threshing floor would also fundamentally change the character of this space in a harmful manner by significantly altering the plan form of the barn and reducing the size of the threshing barn which would alter the space and internal character of this part of the building which is currently only separated from the loft by the existing wall which is only to first floor level.

The application also proposes to completely re-build the single storey 'lean-to' to create the proposed utility room. The submitted structural report concludes that this part of the building is unsafe and in danger of collapse and that re-building is required. The report also recommends consideration be given to reducing the number of openings on the south east flank wall.

Whilst officers accept that this part of the building is in poor condition and that some rebuilding works will be required to stabilise the structure, it is less clear whether the entire demolition of the lean-to is required to achieve this compared to retaining the existing structure with localised repairs and strengthening as necessary. The submitted structural survey states that the lean-to is beyond repair but does not consider or explain whether or not alternative repair strategies would be successful or whether the historic openings on the south east wall could be retained. In the absence of this information it is considered that the total loss of the existing lean-to along with its external stone steps and C17 openings would harm the significance of the building.

The submitted application also proposes to subdivide the upper floor into three bedrooms, each with an en-suite which would not reflect the open floor plan of the original building. The application also proposes to replace an existing vent slot on the south west elevation with a new window which would further harm the existing architectural and historic character of the building and the impact of this is not assessed in the submitted heritage statement. Finally, the submitted plans show that the internal faces of the external walls would be lined. No details have been submitted of what lining is proposed, but creating a smooth lined surface on the walls would further domesticate the agricultural character of the building.

For the above reasons it is considered that the combined impacts of the proposed development and the associated works would harm the significance of the listed building. Approval of the proposals would therefore be contrary to policies GSP3, L3 and HC1 and policies LC4 and LC6. This is the same conclusion reached by the Authority in determining the previous applications in 2014 and the evidence submitted with this application does not indicate that a different decision should be taken now.

It is acknowledged that conversion of a larger part of the barn (that previously approved in 2006 and 2008) to create visitor accommodation would benefit the applicant. It is also accepted that there may be further benefits to creating additional accommodation to local communities and the local economy. However, there remains extant planning permission and listed building consent for a scheme to convert the building in a manner which would not harm the listed building and in this case the Authority's Historic Buildings Architect has provided further advice for an alternative scheme which would better conserve the building. Unfortunately the applicant has not followed this advice or sought additional pre-application advice and requires that this application be determined as submitted.

There is no evidence from any consultees or in representations which would override these conclusions and in this case Historic England advises the Authority to determine the accompanying listed building consent application on the basis of its expert conservation advice. In coming to these conclusions Officers have also taken into account additional supporting information submitted by the agent, but this information provides no substantive evidence to which indicates a different decision should be taken.

It has been concluded that the proposed development would harm the significance of the listed building. Having had regard to recent guidance within the National Planning Practice Guidance it is considered that the development would not lead to the total or substantial loss of the heritage asset and therefore the harm that has been identified cannot be described as substantial, but even less than substantial harm is sufficient to warrant refusal of an application.

Local and national planning policy makes it clear that any harm or loss to a grade II listed building should be exceptional. In this case, it is considered that there are no exceptional reasons or justification for the proposed development which would harm the significance of the listed building. There would be very limited public benefits associated with the proposed development especially as Officers have previously advised upon an alternative scheme to convert the building in an appropriate manner. Therefore it is considered that any public benefits of approving the development would be clearly outweighed by the harm to the listed building that has been identified.

Ecology

A bat survey of the barn has been carried out and the report submitted in support of this application. The report concludes that the barn was not found to support roosting bats but there was some evidence that common pipistrelle bats forage around the farmyard and on one recorded occasion within the barn accessed through a ventilation slot. No evidence of barn owls were identified but two active wren nests along with disused swallow nests were identified within the main central barn.

Having had regard to the evidence within the survey it is considered that the proposed development would be unlikely to harm any identified protected species or their habitat provided that conditions were imposed upon any permission to secure the retention of features within the building to maintain roosting and foraging opportunities for bats and nesting opportunities for birds within the main central barn which the majority of which is the remain unconverted.

It is therefore considered that if the proposed development was considered to be acceptable in all other respects, the proposal would meet the requirements of regulation 53 of the Habitats Directive because the development would secure the conservation of the listed barn in the long term, there would be no satisfactory alternative to secure this outcome and because the development would maintain the favourable conservation status of the identified protected species in accordance with L2 and LC17.

Conclusion

It is considered that the proposed development and associated works would harm the significance of this Grade II listed barn contrary to Core Strategy policies GSP1, GSP3 and L3, Local Plan policies LC4, LC6 and LC8, and guidance in the National Planning Policy Framework.

The proposed development would not harm the amenity of any neighbouring properties or adversely affect protected species or highway safety. However, these issues do not add any significant weight either for or against the proposal and do not otherwise overcome concerns in regard to the impact of the proposed development on the listed building.

Therefore, it is considered that the proposal is contrary to the Development Plan and the Framework. In the absence of further material considerations indicating otherwise, the proposal is therefore recommended for refusal.

Human Rights

Any human rights issues have been considered and addressed in the preparation of this report.

List of Background Papers (not previously published)

Nil