

## **6. Full application – Installation of a 150kw Ground Mounted Photovoltaic Solar Array, Wetwood Farm, Meerbrook (NP/SM/10141046 P.4307 398009/361583 3/11/2014/CF)**

### **APPLICANT: MR AND MRS J & M MOSS**

#### **Site and Background**

Wetwood Farm is a working dairy farm located around 1km to the north of Meerbrook. Land in ownership extends to around 152 hectares and much of this land occupies a hillside position that is overlooked by the Roaches, which lie around 3km to the east of the site.

The farm currently has a dairy herd of 350 cattle and uses approximately 200,000kW of electricity per annum in association with producing milk. The high demand for electricity on the farm arises from processes such as milking, cooling the milk, heating water to wash out milking parlours, and lighting for the buildings. Given the high demand for electricity, there is a clear need to consider energy saving measures on the farm and, where appropriate, renewable energy development to reduce energy costs to promote the future viability of the farm business.

The needs of the business sit alongside the applicants' wider environmental concerns in respect of reducing consumption of non-renewable energy sources and reducing carbon emissions, amongst other things. Progress on making the farm more sustainable is also increasingly required to be able to meet the requirements of various quality assurance schemes and the requirements of the businesses that the applicants sell their milk to.

To this end, the applicants have already taken measures on site to make their business more sustainable by installing solar panels on the roofs of buildings, and installing a bio-mass boiler under permitted development rights. The applicants also sought planning permission for a 50kw 34m high wind turbine in 2013. However, this application was withdrawn prior to determination by the applicants in the face of strong local concerns about the acceptability of the wind turbine and in the knowledge officers were recommending that the application be refused.

#### **Proposals**

The current application proposes the installation of a 150kW ground-mounted photovoltaic array within a field parcel immediately to the south of the existing group of farm buildings at Wetwood Farm. It is stated in the submitted application that the panels would produce 150,000kW of electricity per annum; the farm currently uses around 200,000kW of energy per annum. The array would consist of 600 photovoltaic panels arranged in six rows of panels angled at 30° and facing south.

In this case, each row would contain 100 panels (installed 2 panels high and 50 panels long) and the top edge of the panels would be a maximum of 2.64m above the adjacent ground level. There would be ten metres between the top edge of the panels in one row and the bottom edge of the panels in the next row. The bottom edge of the panels would be fixed one metre above the ground and the panels would be set on frames supported by a foundation post. This means that no concrete hardstanding is required for the array and sheep can continue to graze the land in and around the array. There would, however, be a requirement for underground cabling and a meter cabinet.

In terms of ground area covered by the development, the proposed array would be installed over an area measuring 67.04m x 49.70m (c. 0.33 hectare) in total, which is broadly equivalent in area to one half of a full size football pitch. However, the panels would only take up around one third of this area because of the 10m spacing between the rows. In these respects, the panels would cover a total area of 846.88m<sup>2</sup>, with each row taking up an area of 141.15m<sup>2</sup>. The individual panels would measure 1640mm x 994mm.

## **Site and Surroundings**

As noted above, the application site is to the south of the existing group of large modern farm buildings. The site itself comprises a field parcel that slopes downwards from north to south and that has mature planting along its eastern and northern boundaries. It lies in a slight hollow relative to the adjoining fields to the east, and to the north and west in particular.

There is a public footpath that runs along the edge of the application site, and another nearby public footpath passes the site on higher land to the west. There are, however, no nearby residential properties that directly overlook the site and there is a significant distance between the site and properties to the south of the site. This is significant as the panels are orientated southwards and there are long-ranging views out of the site from its southern boundary.

In terms of its wider landscape setting, the site is located within the landscape character area of the 'South West Peak' and in particular is located within a landscape type characterised in the Authority's Landscape Strategy and Action Plan as 'slopes and valleys with woodlands'. The application site and its immediate surroundings have many attributes in common with this landscape type including permanent pasture in fields enclosed by hedgerows and trees, scattered blocks of trees, and variable shaped, small to medium sized fields of various dates.

The Roaches, despite being some 3km distant, are also a significant feature in the landscape setting of Wetwood Farm, as are the 'upper valley pastures', which characterise the landscape type on lower land between the Roaches and Wetwood Farm; and the 'enclosed gritstone uplands', which is the more dominant landscape character type on higher land to the west of the application site. Gun Hill is a further important landmark within the landscape setting of Wetwood Farm; this lies on higher land to the west of the application site.

## **RECOMMENDATION:**

**That the application be APPROVED subject to the following conditions / modifications:**

- 1. The development hereby permitted shall be commenced within three years of the permission.**
- 2. The development hereby permitted shall not be carried out otherwise than in complete accordance with the submitted plans and specifications subject to the following conditions / modifications:**
- 3. At the time of their installation, the individual solar panels shall be provided with matt black surrounds and an anti-reflective finish and shall be permanently so maintained thereafter.**
- 4. Prior to the installation of the ground mounted array, a landscaping scheme shall be submitted to and agreed in writing by the Authority. Thereafter, the approved scheme shall be carried out in the first planting season after the development has been commenced.**
- 5. Prior to the installation of the ground mounted array, precise details of an interpretation panel, including its design and siting, shall be submitted to and agreed in writing by the Authority. Thereafter, the interpretation panel shall be installed prior to any of the panels within the proposed array being taken into use for the purposes of energy generation.**

- 6. Once the solar panels are no longer required for the purposes of energy generation, the ground mounted solar array shall be completely removed from the land, and the ground shall be reinstated to its original ground within three months of the solar panels being decommissioned.**

### **Key Issues**

- whether the proposed ground mounted solar array would adversely affect the valued characteristics of the National Park.

### **History**

The Authority's records show that various applications for farm buildings at Wetwood Farm have previously been submitted to and approved by the Authority including applications made in 1996, 2001, 2010, 2011 and 2014. As noted above, an application for planning permission for a 34m high 50kW turbine was also submitted in 2013 but this application was withdrawn prior to determination.

### **Consultation:**

County Council (Highway Authority) – No response to date.

Staffordshire Moorlands District Council – No response to date.

National Park Authority (Landscape Architect) - No landscape objections to the proposed solar panels. In particular, whilst there may be limited views of the panels from the Roaches, distance and existing trees will help the panels to be sited into the landscape and are more than likely to look like a part of the agricultural buildings.

The Authority's Landscape Architect also suggests that any surrounds to the panels are black rather than silver and that 7 trees are planted in the adjacent field to the east of the site. These should consist of 3 oak and 4 alder trees to act as replacement trees for the existing ash trees that are to the east of the site. The Authority's Landscape Architect also suggests that a simple A4/A3 interpretation panel being placed on the public footpath. This should cover the purpose of the panels and also include information about the biomass boiler and solar panels for the house.

Parish Council – No response to date.

### **Representations:**

At the time of writing this report, no further representations had been received by the Authority.

### **Main Policies**

#### **National Planning Policy Framework ('the Framework')**

At paragraph 17, the Framework says core land-use planning principles should underpin both plan-making and decision-taking, and sets out 12 core planning principles. One of these 12 core planning principles encourages local planning authorities to support delivery of renewable resources through the planning system. Accordingly, at paragraph 98, the Framework says when determining planning applications for renewable energy development, local planning authorities should approve the application if its impacts are (or can be made) acceptable unless material considerations indicate otherwise.

In this case, the Framework makes it clear that the fact that the ground mounted solar array would be located within a National Park is a highly relevant material consideration in terms of national planning policies. For example, paragraph 115 in the Framework states that great weight should be given to conserving landscape and scenic beauty in National Parks along with the conservation of wildlife and cultural heritage.

In terms of wildlife interests, paragraph 109 of the Framework says, amongst other things, the planning system should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes, and minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity. In terms of cultural heritage, one of the twelve core planning principles in the Framework requires local planning authorities to conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.

This guidance on renewable energy development in the Framework is also supported by the more recently published Planning Practice Guidance (PPG). The section on renewable and low carbon energy in this guidance reaffirms that the need for renewable energy does not automatically override environmental protections, or the need to conserve and enhance landscape, wildlife and cultural heritage especially within a National Park.

The government's Planning Practice Guidance closely reflects the thrust of the following Development Plan policies, which are the most relevant to the current application, and are generally considered to be consistent with the above guidance in the Framework because they support the take up of renewable energy development where its impacts would be acceptable.

### **Key Policies**

Relevant Core Strategy policies: CC2

Relevant Local Plan policies: LU4

These policies relate directly to renewable energy development in the National Park and the recently adopted *Climate Change and Sustainable Building* Supplementary Planning Document (SPD) offers further guidance on the application of these policies. The guidance in this SPD and the provisions of policies CC2 and LU4 are also supported by a wider range of design and conservation policies in the Development Plan listed below:

### **Wider Policy Context**

Relevant Core Strategy policies include: DS1, GSP1, GSP2, GSP3, GSP4, L1, L2 and L3.

Relevant Local Plan policies include: LC4, LC6, LC15, LC16 and LC17.

These policies set out a wide range of criteria for assessing the acceptability of development in the National Park with a particular focus on landscape conservation objectives. The Authority's Landscape Strategy and Action Plan (adopted in 2009) gives further guidance on how to conserve and enhance the established landscape character of the National Park, and is referred to specifically by policy L1 in the Core Strategy. The landscape conservation objectives set out in the Authority's Landscape Strategy and Action Plan should therefore guide the assessment of development proposals that are likely to affect the landscape character of the National Park.

### **Assessment**

#### **Policy Framework**

Policies in the Development Plan and in the Framework are generally consistent because both are supportive in principle of low carbon and renewable energy development in the National Park provided that it can be accommodated without adversely affecting landscape character, cultural heritage assets, other valued characteristics or other established uses of the area as set out in Core Strategy policy CC2 and Local Plan policy LU4.

Within Development Plan policies there is a presumption in favour of the conservation of the landscape character, biodiversity and cultural heritage of the National Park. The Framework confirms that great weight should be given to conserving the landscape and scenic beauty in National Parks and makes a presumption in favour of the conservation of heritage assets and wildlife interests in accordance with the provisions of Core Strategy policies GSP1, GSP3, L1, L2 and L3 and Local Plan policies LC4, LC6 and LC17.

Planning Practice Guidance, published by the government in 2014, confirms that the need for renewable energy does not automatically override environmental protections and great care should be taken to ensure that heritage assets and National Parks are conserved. In short, the desire to encourage the take up and delivery of renewable energy development does not override the conservation purposes of the National Park. Therefore, the key issue in the determination of this application is considered to be whether the proposed ground solar mounted array would conserve the landscape character, cultural heritage assets or other valued characteristics of the National Park including its biodiversity.

#### Policy Guidance on Renewable Energy Development

The Authority's adopted Supplementary Planning Document (SPD) for *Climate Change and Sustainable Building* was adopted after public consultation in March 2013 and should therefore be given substantial weight in the determination of the current application. The Authority's SPD offers advice on renewable energies, including solar arrays. In these respects, the SPD indicates that ground mounted solar arrays may be a sensitive solution in many cases, but it does say that large scale ground mounted solar arrays are not appropriate and that ground mounted solar arrays outside the curtilage of a building should be avoided.

However, this SPD also states very clearly that limiting the visual intrusiveness of a solar array is a key consideration in determining an appropriate location for solar panels, and the siting and layout of a ground mounted solar array. Therefore, the SPD promotes a 'Landscape First' approach, and it has to be acknowledged that guidance in the SPD on ground mounted arrays is not especially supportive of the proposals in the current application.

#### Landscape Strategy and Action Plan

The Authority's Landscape Strategy and Action Plan gives further guidance on renewable energy development and the application of the "landscape first" approach promoted by the Authority's 'Climate Change and Sustainable Building' SPD. The Authority's Landscape Strategy and Action Plan was adopted in 2009 after public consultation and, therefore, should also be given significant weight in the determination of the current application. This document illustrates that the application site is located within the landscape character area of the 'South West Peak' and specifically within the landscape character type of 'slopes and valleys with woodlands'.

In common with the slopes and valleys with woodlands landscape character type, the immediate landscape setting of Wetwood Farm is a peaceful and pastoral landscape with a varied undulating topography characterised by blocks of woodlands and fields of various sizes bounded by drystone walls and hedgerows. Notably, the Landscape Strategy and Action Plan says this landscape type may be appropriate for some forms of renewable energy development.

Equally, the development would be seen in the context of the upper valley pastures that lie in the valley between the Roaches and Wetwood Farm. The upper valley pastures is a settled landscape with dispersed gritstone farmsteads and loose clusters of dwellings, characterised by permanent pasture enclosed by a mixture of drystone walls and hedgerows. The Landscape Strategy and Action Plan says this landscape type may also be appropriate for some forms of renewable energy development.

However, on higher land above the application site at Wetwood Farm the landscape is more characteristic of the enclosed gritstone uplands that tend to be more sensitive to change. The Landscape Strategy and Action Plan says renewable energy infrastructure will generally be inappropriate in this landscape character type. There are also long distance views from the Roaches towards the application site where the proposed array would be seen in the context of the transition between the two different landscape types.

Therefore, the landscape setting of the application site has some capacity to assimilate renewable energy infrastructure but by virtue of its size and scale, and its location outside of the curtilage of the existing group of farm buildings, the proposed solar array may have a significant impact on landscape character. It is therefore reasonable to conclude that the proposed solar array may be difficult to accommodate in this landscape setting unless its siting and the particular characteristics of the application site successfully limits the potential for it to be visually intrusive.

#### Landscape and Visual Impact

In this case, the application site has been carefully chosen to not only maximise the co-efficiency of the solar panels, but also to limit the visual impact of the array. The field within which the array would be installed has a relatively open aspect to the south but there are mature trees along the eastern and northern boundaries of this field. This is highly significant because the existing trees along the eastern boundary would help to foil views into the site from the direction of the Roaches.

In this respect, the panels would be 'sideways on' to the Roaches. This means from higher vantage points, from where the panels might be more readily seen, the ten metre gaps between the rows will break up the physical and visual bulk of the rows, which would be around 3.2m in depth. However, taking into account the intervening distances, the overall scale of the development would be significantly diminished and the visual impact of the array would be further diminished if the panels were to have a non-reflective finish and matt black surrounds.

The array also has the advantage that it would be a static feature in the landscape and would not necessarily draw attention to itself, unlike the turning blades of a wind turbine, for example. Moreover, solar panels are designed to absorb light, and only reflect a small amount of the sunlight that falls on them compared to standing water or glass, for example, and it is not anticipated that the array would give rise to a problem from glare. In particular, an anti-reflective coating would reduce light reflections to between 2 and 4% of the strength of light falling directly on the panels, which would be far less than the glare off most other everyday objects.

Therefore, the overall impact of the array when experienced from the Roaches and distant vantage points to the east of the application site would be more like seeing lines of wrapped silage bails in the landscape, or ancillary outbuildings associated with the existing range of farm buildings, rather than seeing an inappropriate form of isolated or sporadic development in open countryside.

Moreover, the intervening distances and the relatively low height of the top edge of the panels would mean that the panels would not have any significant impact on the landscape character of the enclosed gritstone uplands on higher land above the application site when seen from the Roaches. In particular, the solar array would not skyline and would be sited in a relatively well-screened site that sits in a natural hollow that is at a lower level than much of the surrounding ground. Therefore, the array would not impose itself on the wilder landscape character of the enclosed gritstone uplands and would have a negligible impact on the setting of Gun Hill.

From Roaches Road, immediately below the Roaches, and at lower levels on both the eastern side and western side of the valley overlooked by the Roaches, the array would be increasingly less likely to be seen from vantage points closer to the application site. Primarily because the tree cover and topography of the surrounding land would become increasingly more effective at foiling views into the site and screening the entire length of the rows. There would otherwise be no likelihood that the panels would be seen from vantage points to the north of Wetwood because the existing buildings at Wetwood would block views into the application site.

From the west, the site will be visible from a nearby footpath and there is another footpath which runs along the boundary of the field. From these vantage points, the solar array will be very obvious, but the enclosed nature of the surrounding landscape to the west of the site would limit views into the site from this direction and prevent the array being seen from Gun Hill, for example. In these respects, the array would be seen from a relatively short length of the two footpaths that would be most directly affected by the development proposals because of landscape features such as tree cover, boundary hedges, the topography of the surrounding land, and the buildings at Wetwood. Therefore, it is not considered that the solar panels would have a significantly harmful impact on the enjoyment of the National Park by users of the affected footpaths not least, because as noted above, the development would be a static feature in the landscape.

Whereas wind turbines are sometimes criticised for their harmful impact on tranquillity and on the amenities of their immediate landscape setting, particularly in respect the turning blades, noise and disturbance, and the potential for shadow flicker, the proposed array would be a lower, static feature. In this case, it is also considered appropriate to erect an interpretation panel on the footpath closest to the array to explain why they are there and how they assist the adjacent farm. In these respects, the array would be seen in the context of the nearby farm buildings from the parts of the two footpaths from which the development will be seen. This has the further advantage that the array would be more easily 'read' as part of the farm complex rather than isolated or sporadic development in open countryside. However, the interpretation panel would assist in making this connection.

In terms of viewpoints from the south, it is notable that the application site has less tree cover on its southern boundary and it would be possible to gain views into the application site from higher land on Morridge Top and from vantage points from the Leek direction. However, the intervening distances between the site and Morridge Top and public vantage points to the south means the array is highly unlikely to be especially conspicuous or visually intrusive when seen from points broadly to the south of the application site.

It is therefore concluded that whilst the array may be seen from far distant vantage points on higher land to the east and south of the site, and the array will be very obvious from short lengths of two nearby footpaths, it would not be an unacceptably conspicuous feature in the landscape, despite its size and scale. In this case, the particular characteristics of the site selected for the array, and the presence of mature trees along its eastern boundary, would successfully limit the potential for the array to be visually intrusive and the array would not have a substantially harmful impact on the landscape character of this part of the National Park.

Therefore, taking into account policies in the Development Plan, the Authority's adopted planning guidance and government guidance in the Framework and the supporting Planning Practice Guidance For Renewable And Low Carbon Energy, planning permission could be granted for the proposed ground mounted solar array because it would not have an unacceptable impact on the scenic beauty of the National Park by virtue of the nature of the development and its limited visual impact.

However, any permission for the array should be subject to conditions that specify external finishes for the solar panels, secure the provision of an interpretation panel, and secure a landscaping scheme. A landscaping scheme would be necessary in this case to supplement the existing trees on the eastern boundary of the site, which are Ash trees. This is because, as noted above, these trees play an important role in making the proposed development acceptable in planning terms, and this mitigation for the array should be maintained over the longer term, noting that spread of Ash dieback to the existing trees is a possibility.

It would also be reasonable to require the removal of the array when it is no longer required for generating energy, which would be an identical requirement to the limitations imposed on permitted development rights for solar panels by the Government, and this type of condition would be necessary in the interests of safeguarding landscape character. If the array were no longer required and was otherwise left to fall into disrepair, then it would have an increasingly detrimental impact on its immediate landscape setting.

### Ecology

By virtue of the nature of the development, it is highly unlikely that the proposed array would have a substantial impact on any nature conservation interest. In particular, the array would not have any impacts on bats or birds and there are no records that indicate the application site provides habitat for any other protected species or has any special ecological interest. Moreover, no hardstandings are proposed in the current application, which limits the potential for disturbance of wildlife. Therefore, any approval for the current application would not conflict with specific policies in the Framework or policies L2 and LC17 that seek to safeguard biodiversity interests.

### Heritage Assets

There is no evidence that demonstrates there is any extant archaeology of interest within the application site and there are no nearby listed buildings that could be affected by the development proposals. The intervening distance between Meersbrook Conservation Area and the application site and the very limited intervisibility between the two means that the proposals would have no impact on the setting of the Conservation Area. Therefore, any approval for the current application would not otherwise conflict with specific policies in the Framework or policies L3 and LC15 and LC16 that seek to conserve and enhance the cultural heritage of the National Park.

### Amenity

There are no obvious reasons why the array would detract from the living conditions of any local resident. This is primarily because there are no nearby residential properties other than the two farm houses at Wetwood Farm, and the nearest properties beyond Wetwood Farm to the west north and east of the application site, such as New Zealand, Old Hay Top and Lapwing Hall Farm would not be able to see the development. There is one property to the south of the site from which the array might be seen 'straight on', but this property is over 700m away from the application site. At this distance, the panels could not be reasonably held to be likely to affect outlook or detract from the quiet enjoyment of this property.



As noted above, the array would not give rise to any other amenity issues such as noise and disturbance, shadow flicker, or other issues that are often raised in respect of turbines and, also as above, the nature of the development is such that solar panels are designed to absorb light and only reflect a small amount of the sunlight that falls on them. Therefore, it is not considered that reflectivity is likely to be an issue, despite the size and scale of the proposed array, and it is not considered the panels would harm the general amenities of the local area because of glare.

In these respects, the proposals comply with the specific requirements of policies LC4 and GSP3 and the national planning policies in the Framework that seek to safeguard amenity and protect the living conditions of local residents affected by development proposals.

### Other Considerations

This report sets out the substantive reasons for approval of the current application; it is considered the proposals would not have an unacceptable harmful impact on landscape character, and there are no objections to the proposals on any other grounds. In these respects, the Framework states very clearly that applications for renewable or low carbon development should be approved if the impact of the development is acceptable, or can be made acceptable.

However, it is acknowledged that whilst it is considered the proposals accord with the 'landscape first' approach taken in the SPD, there is some conflict with guidance in the SPD which says large scale ground mounted solar arrays are not appropriate and that ground mounted solar arrays outside the curtilage of a building should be avoided. Equally, whilst it is considered that the array would not be visually intrusive, the array will be seen either fully or partially from various vantage points. In these respects, the Framework also requires the Authority to weigh any harm arising from the proposed array against the public benefits it would achieve.

The electricity produced by the array would clearly make a substantial difference to the farm business, taking into account the panels do not need direct sunlight to work – they can still generate some electricity on a cloudy day. The economic difficulties dairy farms face is well documented, alongside the benefits that dairy farming in the National Park provides in terms of providing local employment opportunities, supporting the wider rural economy and managing the landscape appropriately. In this case, these socio-economic considerations can be given significant weight as the assessment is that the array is unlikely to have more than a very limited impact on the valued characteristics of the National Park, and would not compromise the character of its landscape setting.

It is also recognised that any renewable energy projects provide a valuable contribution to cutting greenhouse gas emissions and in comparison to the energy exported from the grid, the proposed array would reduce carbon emissions by 64.5 tonnes per annum. The array would also reduce dependency on non-renewable energy at Wetwood Farm and help make the business more sustainable. These aim and objectives are fully supported by the SPD on renewable energy and are promoted and encouraged by policy DS1 and GSP1 of the Core Strategy, and national planning policies in the Framework. These environmental considerations can be given significant weight given that the solar array is considered unlikely to substantially detract from the landscape, wildlife and cultural heritage of the National Park, or harm the amenities of the local area.

Moreover, the farm has already introduced renewable energy technologies including the installation of a biomass boiler and installation of solar panels (under permitted development rights) and has pursued other options to meet the farm's energy needs, including a proposed 34m high wind turbine. The application for this turbine was submitted in 2013, but was withdrawn prior to determination. The applicants have also considered mounting solar panels on the roofs of the existing modern farm buildings, but aside from the fact the roofs over the larger buildings do not face south, there is also a problem with the buildings used to accommodate livestock. These buildings have vents in the roof that would discharge over any roof-mounted panels, further

reducing their efficacy.

It is therefore considered that other options have been explored and discounted before the current proposals have come forward and the proposed site for the solar array has been carefully chosen to limit the visual impact of the panels. The array would be far more visually intrusive on other land in the applicants' ownership. As such, it is considered that the least damaging practicable option has been found for the proposed development, which is a consideration that weighs in favour of the current application.

### Conclusions

It is therefore concluded that there are material considerations that weigh in favour of the current application and the benefits of allowing the scheme would outweigh any limited harm arising from any approval of the current application. In these respects, the proposed development can be considered to constitute sustainable development promoted and encouraged by DS1 and GSP1 and the Framework. However, it is considered the proposed development would not have a significant adverse visual impact on its landscape setting, and would not harm the scenic beauty of the National Park. It is also considered that the proposed development would not harm the amenities of the local area and would not harm any other valued characteristic of the National Park.

The application is therefore considered to accord with Core Strategy policies GSP1, GSP3, L1, L3, and CC2 and Local Plan policies LC4 and LU4 and guidance in the Authority's adopted SPD on Climate Change and Sustainable Building and the Authority's Landscape Strategy and Action Plan, and is considered to be in conformity with national planning policies in the Framework and government guidance in the associated Planning Practice Guidance.

Accordingly, the current application is recommended for approval subject to the conditions set out in the earlier sections of the report and listed above.

### 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