

11. OUTLINE APPLICATION – PROPOSED ERECTION OF 2 LOCAL NEEDS SELF BUILD AFFORDABLE HOMES AT DRIVEWAY BETWEEN GREYSTONES & JESMOND, TIDESWELL (NP/DDD/0820/0723, AM)

APPLICANT: MR JAMES ISAAC AND EMMA ISACC

Summary

1. The site is an agricultural field to the west of Sherwood Road, Tideswell.
2. The application proposes two affordable houses to be first occupied by the applicants.
3. The proposed dwellings would not be affordable by size or type or meet the need of the applicants or the wider community. The development would harm the landscape and would be an inappropriate design. Insufficient information has been provided about sustainable construction and climate change and potential impact on trees.
4. The application is recommended for refusal.

Site and Surroundings

5. The site is an agricultural field to the west of Sherwood Road accessed from an existing track located between the dwellings known as Greystones and Jesmond.
6. The field forms part of the strip field system that rises west from Tideswell. The site is outside of the designated Tideswell conservation area.
7. The nearest neighbouring properties are the dwellings on the north and west side of Sherwood Road.

Proposal

8. The application is for outline planning permission but the application form states that no matters are reserved. The application proposes the erection of two 3 bedroom affordable houses on the site to be first occupied by the applicants.
9. The dwellings would be sited to the north of the field and the existing farm access would be extended to provide access and driveways to each dwelling.
10. The dwellings would be link detached and constructed from natural limestone and blue slate with timber windows and doors and gritstone lintels. Each dwelling would have a gross internal floor area of approximately 131m².

RECOMMENDATION:

That the application be REFUSED for the following reasons

1. **The application does not demonstrate that the development would meet eligible local needs for affordable housing. The proposed housing would not be affordable due to its size and type. The application therefore fails to demonstrate exceptional circumstances to allow new build housing within the National Park contrary to Core Strategy policy HC1, Development Management policies DMH1 and DMH2 and the National Planning Policy Framework.**

2. **The proposed site is not well related to the historic built form of Tideswell and would introduce development into the historic strip field system in a manner that would harm the significance of the strip fields and valued landscape character contrary to Core Strategy policies GSP1, GSP3, L1 and L3, Development Management policies DMC3, DMC4 and DMC5 and the National Planning Policy Framework.**
3. **By virtue of its form and massing the proposed development would be an inappropriate design that would fail to reflect or respect the character of the local area contrary to Core Strategy policies GSP3, Development Management Policies DMC3, our adopted design guide and the National Planning Policy Framework.**
4. **Insufficient information has been submitted with the application to demonstrate that the development would achieve the highest possible standards of carbon reductions and water efficiency in order to mitigate the causes of climate change contrary to Core Strategy Policy CC1 the Authority’s adopted Supplementary Planning Document ‘Climate Change and Sustainable Building’ and the National Planning Policy Framework.**
5. **Insufficient information has been submitted with the application to enable to us to assess the potential impact upon trees or inform any necessary mitigation or replacement planting contrary to Development Management policy DMC13.**

Key Issues

- Whether there is justification for the proposed local needs affordable housing and whether the proposed housing is in accordance with policies HC1, DMH1 and DMH2
- The design and landscape impact of the proposed development.

History

11. None relevant.

Consultations

Parish Council – Support and makes the following comment:

Welcome the application, which would allow young residents to stay in the village where they live. The location and plans are suitable and in a good location.

Highway Authority – No objections subject to conditions.

District Council – No response to date.

PDNPA Archaeology – Makes the following comment:

“Archaeological sensitivity and significance of the site

The proposed development is in an area of Ancient Enclosure as identified in the PDNP Historic Landscape Character Assessment. These are fossilised medieval strip fields that relate to the medieval open field system of Tideswell, evidenced by map and field shape evidence (characterised by the enclosed narrow strips with a characteristic s-shaped

curve).

The fossilised medieval strip fields are a rare and precious landscape character type and important to the Peak District National Park. They are a non-designated heritage asset of archaeological interest and have intrinsic landscape value, providing the area a distinct character, a time depth to the landscape. They are the most important, and rarest, historic landscape feature type within the National Park.

The surviving drystone field walls that define the northern and southern edges of the proposed development plot form the boundaries of one such surviving strip (or small group of strips) forming a long linear plot. This area of Tideswell is away from its historic core and all other development in this area represents modern development extending over areas of the former fossilised medieval field system.

This particular field has never been subject to any archaeological survey, but surrounding fields have been. These suggest the potential of the site to retain belowground remains relating to medieval and post-medieval agricultural activity, such as dewponds, lost boundaries, evidence of historic ploughing and arable cultivation etc.

The development of Tideswell and its field system from the early medieval period onwards is currently not fully understood, particularly the relationship of the early routeways, settlement and field system and the extent to which the established pattern related to earlier development and land use. And, the impact of the move to sheep husbandry with the private enclosure of former arable fields and resulting changes in farming practice. Any such remains would have a degree of archaeological interest but would likely to be of no more than local significance.

Archaeological impact of the development

The groundworks associated with the proposed development, including foundation trenches, new drive and parking areas, landscaping, new drainage, services etc. will most likely result in the truncation, damage, disturbance or complete destruction of any surviving archaeological remains at this site relating to medieval and post-medieval agricultural activity. In the worst case this would result in harm to or the complete loss of their significance.

Taking into account their likely nature and significance, although this can only be estimated at this stage, I am confident that any impacts and harm will be minor, and this can be appropriately mitigated through a condition scheme of archaeological monitoring.

The proposed development would result in further expansion of 20th century development over the historic field system of Tideswell. The legibility of the field system relies on the continued survival of the drystone wall field boundaries, and the proposed development sits entirely within a 'strip' and will not directly affect the field walls that current define the edge of this fossilised strip.

However, the further expansion of development into the field system will harm its character and legibility. As one small area in a large field system, this cannot be considered to be anything more than minor harm in its own right, but the cumulative impact of development out into the field system, further back from the road also needs to be considered when a planning decision is reached."

PDNPA Ecology – Makes the following comment:

"There are no records of important habitats or species on site. There are however two water vole records nearby, the nearest being 214m away but there is no suitable habitat on site and so this proposed development would not affect this species.

The applicants have submitted a protected species form and declared that a protected species survey is not required. The applicants have also stated that there are no trees within 15m of the proposed development. Our latest aerial imagery dated 20th May 2018 shows at least three mature trees on the site, these are not visible on the photographs supplied by the applicant and so presumably these trees were removed sometime between May 2018 and now. The removal of these trees may constitute a loss of wildlife habitat in association with this planning application and so I would ask that three trees be planted to replace them.

There is also a row of semi-mature trees on the southern boundary of the field where the development is proposed. If these trees are retained then I would be satisfied that this development will not adversely affect wildlife on site.”

PDNPA Landscape – No response to date.

PDNPA Tree Officer – Object on the grounds of insufficient information. Makes the following comment:

“There are trees on site and adjacent to the site, but no tree survey has been provided to assess the impact of the proposals on the trees. Therefore the information submitted is not sufficient to assess the impact on the trees on site and adjacent to the site.

Although a landscaping plan has been submitted, it is limited in scope and does not identify the trees that are currently on site or any additional tree planting that might be required as part of the development.”

Representations

We have received 25 representations to date. 8 letters object to the development and 17 support. The reasons given are summarised below:

Object

- The site is inappropriate because it is a green field located behind the line of houses on Sherwood Road.
- The proposed buildings do not reflect the built form of development on the north side of Sherwood Road and do not constitute in-fill development.
- Approval of the application would set a precedent for further development of the fields behind Sherwood Road.
- Mature trees on the site were felled and removed prior to the submission of the application.
- The development would harm wildlife in adjacent fields.
- There are holiday lets, second homes and empty properties in the village. These should be utilised to provide affordable housing before allowing new build development on green field sites.
- The proposed dwellings are elevated above and would overlook the properties along Sherwood Road and harm the privacy of occupants.
- Query the size and need for the proposed garages and raise concern that they will be

- converted to provide additional living space.
- The development would cause noise and light pollution which would harm the amenity of neighbouring properties.
- Planning permission has been refused previously for a dwelling at this property.
- There are developments in Bradwell and Peak Dale that offer affordable housing.
- Question the applicants need for affordable housing.
- The development would result in the loss of valuable agricultural land.

Support

- The applicants are from the village and are in need of affordable housing.
- The development will allow the applicants to continue living close to their places of work.
- The development will not be visible and will not harm the character of Tideswell.
- Tideswell is a sporadic settlement and does not have rows of houses in straight lines everywhere. The proposed houses will fit in well on this site and compliment the layout of the village.
- The application previously refused planning permission on the site was for a market dwelling not an affordable dwelling to meet local need.
- Trees were removed from the site following advice from the PDNPA.
- There is a need for 3 bedroom properties in the village and it is preferable to build a 3 bedroom property rather than extend at a later date.

Main Policies

Relevant Core Strategy policies: GSP1, GSP2, GSP3, GSP4, DS1, CC1, HC1, L1 and L2

Relevant Development Management policies: DMC3, DMC4, DMC5, DMC11, DMC12, DMC13, DMH1, DMH2, DMH3, DMH11, DMT3, DMT8, DMU1 and DMU2.

National Planning Policy Framework

12. The National Planning Policy Framework (NPPF) should be considered as a material consideration and carry particular weight where a development plan is absent, silent or relevant policies are out of date. In the National Park the development plan comprises our Core Strategy 2011 and the Development Management Policies 2019. Policies in the development plan provide a clear starting point consistent with the National Park's statutory purposes for the determination of this application. There is no significant conflict between prevailing policies in the development plan and the NPPF and our policies should be given full weight in the determination of this application.

13. Para 172 states that 'great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads.'
14. Para 77 states that in rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs. Local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs, and consider whether allowing some market housing on these sites would help to facilitate this.
15. The NPPF defines rural exceptions site as small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection.

Peak District National Park Core Strategy

16. Policy DS1 sets out the Development Strategy for the National Park. Part D says that in named settlements such as Tideswell there is additional scope to maintain and improve the sustainability and vitality of communities. In or on the edge of these settlements amongst other things new building development for affordable housing is acceptable in principle.
17. Policy HC1 says that exceptionally, new housing can be accepted where the proposals would address eligible local needs and would be for homes that remain affordable with occupation restricted to local people in perpetuity. The provisions of HC1 are supported by policy DH1, DH2 and DH3 of the Development Management Policies, which gives more detailed criteria to assess applications for affordable housing to meet local need.
18. Policy GSP1 sets out the broad strategy for achieving the National Park's objectives having regard to the Sandford Principle, (that is, where there are conflicting desired outcomes in achieving national park purposes, greater priority must be given to the conservation of the natural beauty, wildlife and cultural heritage of the area, even at the cost of socio-economic benefits). GPS1 also sets out the need for sustainable development and to avoid major development unless it is essential, and the need to mitigate localised harm where essential major development is allowed.
19. Policy GSP3 sets out development management principles and states that all development must respect, conserve and enhance all valued characteristics of the site and buildings, paying particular attention to, amongst other elements, impact on the character and setting of buildings, scale of the development appropriate to the character and appearance of the National Park, design in accordance with the National Park Authority Design Guide and impact on living conditions of communities.
20. Policy GSP4 says that to aid the achievement of its spatial outcomes, the National Park Authority will consider the contribution that a development can make directly and/or to its setting, including, where consistent with government guidance, using planning conditions and planning obligations.
21. Policy CC1 states that development must make the most efficient and sustainable use of land, buildings and natural resources, taking into account the energy hierarchy and achieving the highest possible standards of carbon reductions and water efficiency.

Development Management Policies

22. The most relevant development management policies are DMH1 and DMH2. Policy DMH11 is also relevant as it states the need for a planning obligation to secure the affordability of the dwellings in perpetuity if the scheme were permitted.

23. Policy DMH1 – New Affordable Housing

A. Affordable housing will be permitted in or on the edge of Core Strategy policy DS1 settlements, either by new build or by conversion; and outside of Core Strategy policy DS1 settlements by conversion of existing buildings provided that:

- (i) there is a proven need for the dwelling(s); and
- (ii) any new build housing is within the following size thresholds:

Number of bed spaces and Maximum Gross Internal Floor Area (m²)

One person	39
Two persons	58
Three persons	70
Four persons	84
Five persons	97

B. Starter Homes will be permitted as part of a development of housing to enhance a previously developed site.

C. Self-Build and Custom Build housing will be permitted on rural exception sites in accordance with Part A regarding proof of need and size thresholds.

24. Policy DMH2 First occupation of new affordable housing

In all cases, new affordable housing must be first occupied by persons satisfying at least one of the following criteria:

- (i) a person (and his or her dependants) who has a minimum period of 10 years permanent residence in the Parish or an adjoining Parish inside the National Park and is currently living in accommodation which is overcrowded or otherwise unsatisfactory; or
- (ii) a person (and his or her dependants) not now resident in the Parish but having lived for at least 10 years out of the last 20 years in the Parish or an adjoining Parish inside the National Park, and is currently living in accommodation which is overcrowded or otherwise unsatisfactory; or
- (iii) a person who has an essential need to live close to another person who has a minimum of 10 years residence in a Parish inside the National Park, the essential need arising from infirmity.

25. Policy DMC3. A says where development is acceptable in principle, it will be permitted provided that its detailed treatment is of a high standard that respects, protects and where possible enhances the natural beauty, quality and visual amenity of the landscape, including the wildlife and cultural heritage that contribute to the distinctive sense of place.

26. Policy DMC3. B sets out various aspects that particular attention will be paid to including: siting, scale, form, mass, levels, height and orientation, settlement form and character, landscape, details, materials and finishes landscaping, access, utilities and

parking, amenity, accessibility and the principles embedded in the design related SPD and the technical guide.

27. Policy DMC4. A says that planning applications should provide sufficient information to allow proper consideration of the relationship between a proposed development and the settlement's historic pattern of development including the relationship of the settlement to local landscape character. The siting of the development should complement and not harm the character of these settlements.
28. Policy DMC5 says that planning applications for development affecting a heritage asset must clearly demonstrate its significance including how identified features of value will be conserved or where possible enhanced and why the proposed development are desirable or necessary. Development of a heritage asset will not be permitted if it would result in any harm to, or loss of, the significance, character and appearance of a heritage asset (from its alteration or destruction, or from development unless in the case of less than substantial harm the harm is weighed against the public benefits of the proposal).
29. Policy DMC11. A says that proposals should aim to achieve net gains to biodiversity or geodiversity as a result of development. In considering whether a proposal conserves and enhances sites, features or species of wildlife, geological or geomorphological importance all reasonable measures must be taken to avoid net loss.
30. Policy DMC13 says that planning applications should provide sufficient information to enable impact on trees, woodlands and other landscape features to be properly considered. Development should incorporate existing trees which should be protected during the course of the development.

Assessment

Principle of affordable housing

31. Our policies do not allow new build housing in the National Park unless there are exceptional circumstances. One circumstance where housing can be permitted is under policy HC1. A where development would meet eligible local need for affordable housing.
32. The site is located on the edge of Tideswell, therefore the erection of affordable housing is acceptable in principle if there is a proven need for the dwellings, the housing is within our maximum size thresholds and the applicants satisfy our occupation criteria in accordance with policies DMH1 and DMH2.
33. The applicants are the intended first occupants of the dwellings. The applicants are siblings and state that they have lived in Tideswell their whole lives and therefore satisfy criteria (i) of policy DMH2. We have requested evidence to demonstrate the applicants' local qualification but this has not been provided to date.
34. The applicants have both registered with Home-Options and provided correspondence with the Housing Authority. This demonstrates that both applicants are in need of affordable housing and are eligible to bid for available homes. The letters show that both applicants were registered in July this year, but no evidence of a property search has been provided to demonstrate that any available housing cannot meet their need.
35. A housing need survey for Tideswell was carried out by the Housing Authority in 2017. This identifies that around 20 households are in need of affordable housing. The predominant need is for 2 bedroom houses for couples and smaller families with a

smaller requirement for 3 bedroom houses and some bungalow provision.

36. The application proposes the erection of two link detached 3 bedroom houses. The gross internal floor area of each dwelling would be 131m². This is significantly above the 97m² maximum for a five person dwelling allowed by policy DMH1.
37. The Housing Authority have assessed that Mr Isaac's household has a need for a 2 bedroom three person dwelling (70 m² maximum) and Ms Isaac's household has a need for a 2 bedroom two person dwelling (58 m² maximum). Therefore, the proposed dwellings would be significantly larger than the applicants need. The proposed dwellings would not be affordable due to their size, and would not meet the need of the applicants identified by the Housing Authority or meet wider community need identified by the housing need survey.
38. Therefore, while the applicants may be able to demonstrate that they have a local qualification and are in need of affordable housing it is clear that the proposed dwellings would not be of a size or type that would be affordable now or in perpetuity or meet their need contrary to policies HC1 and DMH1.

Siting and landscape impact

39. The site is an agricultural field within one of the strip fields that rises up west from Sherwood Road. The proposed houses would be sited perpendicular to Sherwood Road and beyond existing modern agricultural buildings. The site is located within the limestone village farmlands landscape character type.
40. The site is within an area of ancient enclosure as identified in our Historic Landscape Character Assessment. These are fossilised medieval strip fields that relate to the medieval open field system of Tideswell. These are a rare and important landscape character type in the national park and a non-designated heritage asset of archaeological interest and intrinsic landscape value.
41. The site is away from the historic core of Tideswell and nearby development is modern extending over areas of the former fossilised medieval field system. The development along Sherwood Road is linear and forms the western edge of Tideswell with only two groups of farm buildings extending beyond the houses along the entire length.
42. The land rises up away from Sherwood Road and therefore the proposed development would be visible extending beyond the established edge of Tideswell from Sherwood Road, the public footpath to the north and in wider views to the east. The existing tree planting to the southern boundary of the site, if retained, would provide some mitigation to views from the south but would not affect views from the north or the wider landscape.
43. The proposal would introduce new residential development beyond the established edge of Tideswell and into the historic field system. The development would not reflect the historic built form of the village and would result in further linear development into the strip field system.
44. Therefore, the development would not conserve or enhance the landscape character of the area and would result in harm to the historic and archaeological significance of the strip field system contrary to policies GSP1, GSP3, L1, L3 and DMC4 and DMC5. This harm would be less than substantial and therefore must be weighed against any potential public benefits.

45. The provision of affordable housing could in principle offer a public benefit if it would meet the need of the local community and be retained in perpetuity. However, there is no evidence to indicate that this is the only site available in Tideswell to provide affordable housing and we are aware of a potential large scheme of affordable housing coming forward on the field between Sherwood Road and Richard Lane.
46. We have determined that the proposed houses would not be affordable by size or type. Therefore, the development would only provide a private benefit to the applicants in meeting their desire for a property of that size. This does not override the harm to the landscape and historic strip field system that has been identified.

Design, sustainable building and climate change

47. The proposed dwellings would be constructed from natural limestone and blue slate and would be provided with pitched roofs. Windows and doors would be timber with natural gritstone lintels.
48. The dwellings have a deep plan form which results in very wide gables, vertical form and significant areas of roof above the walls. Therefore in broad terms while the materials and detailing of the dwellings would reflect local built traditions, the form and massing of the dwellings would more closely reflect modern suburban development and would not reflect the traditional built form in the locality, which is characterised by narrow gables, horizontal form and low eaves.
49. Therefore the proposed dwellings do not reflect or respect the traditional vernacular within the conservation area and are not in accordance with our adopted design guide.
50. The application states that the scheme has been designed to comply with requirements for insulation and low energy fixtures and fittings. However, there is no information provided with the application to demonstrate how it has been designed to reduce energy, water consumption, and mitigate the impacts of climate change through sustainable design and construction.
51. Policy CC1 and the NPPF require development to make the most efficient and sustainable use of land, buildings and natural resources, take account of the energy hierarchy and achieve the highest possible standards of carbon reductions and water efficiency.
52. No evidence has been submitted to show how the scheme has been designed to take advantage of passive design elements, sheltering or solar gain. No evidence of insulation, glazing, heating systems, lighting or heat recovery systems has been included and no low carbon and renewable energy measures, water saving measures or waste management measures are proposed.
53. These issues relate to the fundamental design and layout proposed along with other measures such as low carbon and renewable energy. This issue could not be dealt with by a planning condition because it is not reasonable to impose a condition, which potentially could require fundamental elements of the scheme to be redesigned.
54. The application therefore is not in accordance with policy CC1 and our adopted supplementary planning guidance 'climate change and sustainable building'.

Impact upon amenity

55. A number of concerns have been raised in representations about the potential impact of the development upon the amenity of neighbouring properties, particularly those to

the south east along Sherwood Road.

56. The field and proposed site is elevated above the level of the neighbouring dwellings but at the closest point, the new dwellings would be approximately 45m away from the dwelling known as Kirkstone, and approximately 21m from its rear garden. Therefore while the development would be visible from these dwellings given the separation distances the development would not result in any significant overlooking or loss of privacy to neighbouring dwellings.
57. Concern has also been raised about the impact noise and light upon amenity particularly from vehicle movements. The development would generate vehicle movements but these would be relatively infrequent and given the distance from the development from neighbouring properties would not be significant or harm the amenity of neighbouring properties.
58. Similarly, due to the distances involved there are no concerns that the development would be overbearing to neighbouring properties or result in any significant loss of light. Therefore, we conclude that the development would not be contrary to our detailed design guidance in respects of amenity and not harm the amenity, security or privacy of any neighbouring property.

Trees and protected species

59. The site is improved grassland and there is no evidence of any protected species or habitat within the field that could be affected by development. Give the distance to any designated site the development would not result in a harmful impact.
60. From assessing aerial photographs and from representations it appears that a number of mature trees have been removed from the site. We understand the concerns raised in representations, however, these trees were not subject to a tree protection order (TPO) or within the conservation area and therefore our consent was not required for their removal.
61. There are a number of mature trees remaining along the southern boundary of the site. These are away from the location of the proposed dwellings but the proposed drive would extend past these trees and potentially affect their root system. These existing trees make a positive contribution to the landscape and character of the area and therefore we agree with our Tree Officer that a tree survey is required to understand potential impacts on trees and if any mitigation is required during construction.
62. No tree survey has been submitted and therefore we have insufficient information to assess the impact on trees or what mitigation may be required to protect them during construction contrary to policy DMC13. If the tree survey indicated that trees needed to be felled to facilitate the development then a protected species survey would also be required.

Other Issues

63. If approved, a planning condition would be required to ensure that onsite utilities infrastructure is installed underground this would ensure the proposal is in accordance with policies DMU1 and DMU2.
64. The development would be provided with adequate off-street parking and turning space in accordance with our local standards and having regard to advice from the Highway Authority we agree that subject to conditions that the development would not harm highway safety in accordance with policies DMT3 and DMT8.

Conclusion

65. The application has not demonstrated that the proposed occupants have a local qualification or that their need for affordable housing could not be met by existing housing stock. However, even if this were demonstrated the proposed dwellings would be significantly larger than our maximum size for a five person dwelling and therefore would not be affordable by size or type or meet the need of the applicants or the wider community contrary to policies HC1, LH1 and LH2.
66. The proposed site is not well related to the historic built form of Tideswell and would introduce development into the historic strip field system in a manner that would harm the significance of the strip fields and valued landscape character contrary to policies GSP1, GSP3, L1, L3, DMC3, DMC4 and DMC5. This harm would not be outweighed by public benefits.
67. The form and massing of the proposed dwellings is suburban in character with wide gables, vertical proportions and high eaves and therefore does not reflect traditional built form contrary to policies GSP3, DMC3 and our adopted design guidance.
68. Insufficient information has been submitted with the application to demonstrate that the development would achieve the highest possible standards of carbon reductions and water efficiency in order to mitigate the causes of climate change contrary to policy CC1 and our adopted Supplementary Planning Document 'Climate Change and Sustainable Building'.
69. Insufficient information has been submitted with the application to enable to us to assess the potential impact upon trees or inform and necessary mitigation or planting contrary to policy DMC13.
70. Having taken into account all material considerations and issues raised in representations we conclude that the proposed development is contrary to the development plan. Material considerations do not indicate that planning permission should be granted. Therefore, the application is recommended for refusal.

Human Rights

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

List of Background Papers (not previously published)

72. Nil
73. Report Author: Adam Maxwell, Senior Planner