

12. NEW AFFORDABLE HOUSING: FLOORSPACE THRESHOLDS (BT/IF)

Purpose of Report

1. To explain and enlarge upon the advice given to the December and January meetings of the Planning Committee to the effect that the adoption of Policy DMH1 of the Development Management Policies (which controls the size of new affordable housing) changes previous policy and practice in relation to private sector affordable housing, in that in future:
 - i. a new affordable house shall only have sufficient bedrooms to meet the immediate space requirements of an intended occupier (e.g. in effect that, if the intended occupier does not yet have children, he/she can only have a one bedroomed house); and
 - ii. in calculating the size of a house, the floor area of any garage must be taken into account; and
 - iii. to outline the legal processes and other history that the Authority went through to effect this change of policy and practice and how the public and other consultees were involved in these changes and their responses

Introduction

2. This report takes members through our policy and guidance to give members the background to our current approach on size limits for affordable housing. It then provides commentary against each of the points outlined above before providing a conclusion and some recommendations to address any matters of consistency or clarity going forward..

National Park policy and guidance

3. The Authority's housing policies have sought to address the most fundamental housing needs of its communities, particularly since the Structure Plan was adopted in 1994.
4. The housing need is driven by affordability and availability and it is significant and persistent. It is a product of several issues including:
 - the general attractiveness and aspiration factor attached to rural areas, particularly in retirement;
 - to policies aimed at conserving valued built environment and landscape by limiting the supply of new housing to levels which do not harm the character of the area; and
 - it is also a product of persistent low average resident wages including but not limited to those born and brought up in the area. The cost of living in the National Park has escalated since the Structure Plan to the extent that in some villages the house price to income ratio is now around 12:1¹.
5. The Authority has known for a long time that restricting occupancy of affordable houses puts some downward pressure on the value of houses but, given the prevailing house price inflation across all size and type of houses, this alone does not make houses affordable to those in housing need locally. As a guide, Government models of affordable housing consider that the rental costs should be no more than 80% of full market rental costs. The Housing Manager for Derbyshire Dales has recently advised that the discounted cost of a modest two bedroom Discounted Market Sale house in

¹ Source: Robert Cogings: Derbyshire Dales Housing Manager February 2021

Hathersage would still be £240k², and therefore too expensive for those in housing need. Significantly these values highlight that the issue of affordability has grown beyond the intent of policy supporting those in low to moderate income and towards those also in middle income and professional sectors. In summary acute affordability remains the key material issue underpinning our exceptional approach to housing delivery alongside routes which drive conservation and enhancement.

Background to Floorspace Guidelines

6. In the 2001 Local Plan the Authority first introduced floorspace thresholds into its housing policies to go alongside occupancy restrictions (paragraph 4.24).

4.24 As a guide the National Park Authority considers dwellings to be of an affordable size where they are no larger than the following total net floor area:

*One person 34 square metres
Two persons 50 square metres
Three persons 62 square metres
Four persons 75 square metres
Five persons 87 square metres*

7. This worked alongside further policy wording seeking limits on the size and type of properties in the knowledge that these were the strongest tools available to the Authority as local planning authority, as distinct from controls that maybe available to Housing Authorities or Housing Associations. The objective was to control value and ensure the houses could continue to serve a land use purpose for the people for whom they were intended (people in housing need as that term is defined by the housing authority and the Housing Acts)
8. Housing Associations and the Chief Housing Officer for Derbyshire Dales District Council were consulted on these figures and the figures above represent their advice as included and adopted with the 2001 Local Plan..
9. In addition, our policies allowed for extensions to houses. The 2001 Local Plan paragraph 4.43 stated the following in respect of extensions and alterations generally. (text made bold and/or underlined for purposes of this report only)

“Householders may wish to extend their homes to improve the standard of property or to accommodate changing personal and family needs. Extensions include garages and outbuildings..... The National Park Authority’s experience and advice is that extensions of up to 25% by floorspace or volume are likely to be acceptable. However, in respect of some houses this may be too big³. Further advice on this issue will be included in Supplementary Planning Guidance.”

Production of Supplementary Planning Guidance

10. The production of supplementary planning guidance *Meeting the local needs for affordable housing in the Peak District National Park* (SPG) in 2003 followed a series of successful challenges to conditioned occupancy restrictions leading to their removal from permitted locally needed homes and rendering them in effect open market properties, lost as affordable homes to the local community in perpetuity. The SPG strengthened practice in several ways, but notably in terms of requiring a S106 legal agreement rather than conditions and introducing the concept of “more affordable” homes as distinct sector from

² Source: Robert Cogings: Derbyshire Dales Housing Manager February 2021

³ In all cases the text made bold is for the purposes of this report to aid members’ understanding of the logic provided in this paper

true affordable homes delivered and managed in perpetuity by Housing Associations. The “more affordable” bracket has since become more widespread in national definitions under the term “intermediate social housing”, including products such as discounted market homes and starter homes.

11. Greater detail was included in the SPG in relation to extensions and over investment (Chapter 7)⁴. This clarified the ability to extend by up to 10% for affordable houses (not 25%) to allow for changes in person’s circumstances, but not make properties unaffordable.

12. It too stated that

“garages may be granted provided the applicant signs up to a legal agreement that says the garage will be solely used as a garage and not as ancillary living accommodation, and provided the applicant (and subsequent occupiers) will not seek removal of the local occupancy condition at a later date as a result of the consent to exceed Local Plan guidelines”.

13. Importantly, in the context of this paper, the 2003 SPG went on to say that:

“Similarly, other reasons for over investment⁵ in a property are not a legitimate reason to seek removal of the occupancy condition.”

14. This statement reads alongside garaging in the same paragraph and reflects the view at that time that garaging was recognised to be a form of over investment. It also recognised the pressure that such over investment could bring to remove occupancy restrictions.

15. The 2001 Local Plan and 2003 SPG remained our adopted policy and guidance until the Authority adopted the Development Management Policies document in 2019 (Chapter 6 Policy DMH1: New Affordable Housing). At this point the Authority agreed that the SPG should fall away, as the intent of these documents had become mainstream.

16. Nevertheless the previous policy and SPG had also led to a practice, led by agents, whereby affordable houses were regularly being permitted at or near the upper limit of the policy thresholds irrespective of the applicant’s actual housing need, and the guidance and intent of policy on floorspace. So, provided the house didn’t exceed the upper threshold for the largest house that could be permitted by our old affordable housing policy and SPG it wasn’t considered to matter whether it exceeded the applicant’s personal housing need. This approach responded in some cases to an applicant’s preference rather than their proven need.

17. The identified needs of the area include a range of single person through to family homes and it was considered important to seek to achieve the intent of a more varied and affordable stock through the consistent application of policy rather than building to a standard maximum size. The new development plan document therefore sought a return to the original objective of addressing affordable housing needs in perpetuity.

⁴ SPG paragraph 77 Extensions or over-investment

⁵ By implication therefore garages represent overinvestment.

Development Management Policies (2019)

18. New policy DMH1 provides explicit thresholds for affordable housing and paragraph 6.53 states what should be included in that internal floorspace calculation.⁶ It states

*For the purpose of this policy, the Gross Internal Areas of a dwelling is defined as the total floor space measured **between the internal faces of the perimeter walls**. This includes partitions, structural elements, cupboards, ducts, flights of stairs and voids above stairs. The Gross Internal Areas should be measured and denoted in m². The Gross Internal Areas in the space standard are a refinement of existing standards, and aim to balance a high degree of functionality with affordability.*

19. Policy DMH7: Alterations and Extensions and Paragraph 6.54 do however retain the provision to extend affordable houses by 10%, provided in the case of larger houses this would not exceed the upper threshold specified for a five bed space house. (Bed spaces are different to bedrooms and are used to enable an assessment of the housing need of different numbers and ages of people that make up a household)
20. The revised floorspace thresholds represented an uplift on the 2001 Local Plan thresholds to recognise Government minimum space requirements for funding such housing through the Homes and Communities Agency (now called Homes England). For our plan purposes however they are considered maximum floor spaces because of the extremely high value of even small houses in the National Park.
21. Whilst the thresholds are acknowledged by housing bodies to be tight, these bodies understand the reasons for them and have worked successfully with them since they were adopted in 2019. However, in recognition of the tight thresholds, the plan supporting text paragraph 6.58 creates the flexibility to recognise a particular type of additional need, such as that created by disability. The supporting text asks that applicants work within the floorspace limits **wherever possible**. This gives the opportunity for applicants to state that this isn't possible and for the Authority to agree flexibility as an exception. This would also require a legal agreement to ensure the property continues to serve the purpose for which it was permitted.

Commentary

22. The trigger for this paper is a challenge on the following two statements.

1. **A new affordable house shall only have sufficient bedrooms to meet the immediate space requirements of an intended occupier (e.g. in effect that, if the intended occupier does not yet have children, he/she can only have a one bed roomed house); and**
2. **in calculating the size of a house, the floor area of any garage must be taken into account; and**

23. The issue is that the advice and practice in applying the current policy is different to that applied under our previous policy and SPG. The question is why. The answer is that the way the previous policy and SPG was applied responded in some cases to an applicant's individual preference rather than their proven need.

⁶ Development Management Policies. Part 2 of the Local Plan for the peak District National Park. Paragraph 6.53

24. In reviewing policies this was considered illogical and inequitable. It disregarded the fact no-one else living in the National Park can buy land and build houses to their preferred size when they have plans to increase the size of their household. To grant that ability to individuals goes beyond the aim of addressing the affordable housing needs of the community and responds instead to individual preference.
25. Whilst it was arguably both illogical and inequitable, there was enough leeway in the SPG to allow this practice to take root. However, the fact that the SPG acknowledged the risks to ongoing affordability for future buyers or tenants, by requiring legal agreements to be signed to mitigate risk underlines that it was not anticipated this should become normal practice.
26. The currently adopted plan explains the logic for restricting house size and relates back to earlier logic regarding the limits of control available to a planning authority, ie principally via size and type, working with appropriate tools such as legal agreements. Paragraph 6.45 states:

Where affordable housing is proposed, the size of housing is controlled to ensure they remain affordable and for local people in housing need. Size can be controlled by a planning authority and has over successive plan periods proved an effective planning tool, alongside restricted occupancy in holding values below market value to the extent that houses remain affordable to people in housing need locally. It is considered the most reliable and practical way to achieve this objective because a planning authority can employ size as a way to control price but cannot use prevailing land and property values to indicate appropriate size. The mix of houses should reflect what is needed in the area.

27. Paragraph 6.46 then clarifies that for houses built by individuals:

Homes built by individuals to meet their own need are classified as intermediate houses (between pure affordable rent and shared ownership prices and unencumbered open market rent and sale prices) because they can be sold on or rented by the first owner and occupant after a period of three years to persons who are not in housing need provided the persons satisfy the local connection criteria.

28. Paragraph 6.48 then states that:

*The ongoing value of these houses will be higher because of the less stringent occupancy conditions, **but the size of the housing will nevertheless be controlled in line with the original applicant's housing need.***

29. This follows directly from the available routes for housing set out in core policy HC1, ie housing development provided as an exception either to address the local need for affordable housing, or where it drives the conservation and enhancement of the National Park. Policy DMH1A follows up the text by stating that affordable housing will be permitted provided that there is a **proven need for the dwelling(s)**.
30. The new policy and text does however create the ability for members and officers to make exceptions where the particular circumstances of an applicant's housing need mean they cannot work within the floorspace thresholds.
31. Paragraph 6.48 does state that:

In these [individual] cases greater flexibility will be afforded in terms of the size requirement up to the maximum of 97m² in accordance with policy DMH1.

32. The plan isn't specific about what could be permitted as an exception (flexibility) to address a particular person's housing need. So, in the absence of any definitive list of potential exceptions to policy DMH1, it is reasonable to conclude that in some circumstances a garage, for example, may be needed.
33. However, the previous SPG Page 15 paragraph 7.7⁷ recognised that garages went beyond Local Plan guidelines, and implied that they represented over investment and would create pressure to lift occupancy restrictions. Given the known impact of over-investment on value it was logical for the current policy not to continue to encourage that or any other type of development with affordable housing.
34. The planning approach since the adoption of the DMP policies and the falling away of the SPG should therefore be to respond positively only to a specific need for the applicant to have a garage or other form of over-investment for reasons connected with their particular housing need. (i.e. there is evidence that they are essential)
35. This flexible approach was adopted at Appledrop Charlotte Lane Bradwell⁸ where the Authority gave flexibility to an applicant to incorporate an integrated garage based on their particular 'disability related' need, without compromising our policies on size of property and eventual value. The floorspace went beyond that normally permitted for a household of that size, but to address this the Authority agreed that the floorspace could include the 10% extension allowance granted by DMH7 (provided we removed the right to extend again in future) This solution largely met DMH1 and DMH7. It also used the flexibility provided by the Local Plan's supporting text to go above the overall floorspace thresholds in policy. This was an exception based on the individual's need and respecting the policy wording that accepts it will not always be possible to address a person's housing need and work within the thresholds.
36. Policy DMH1 does not say we should base our assessment on an applicant's theoretical housing need for a size of household that may or may not materialise in future, and that clearly is not the intent of the policy.
37. Returning to the particular issue of over-investment, garages obviously add value to any property⁹ and make them less affordable to future occupants because valuations will inevitably be higher and justify a higher rent or purchase price regardless of any occupancy restrictions.
38. However, given our current policy wording and in particular paragraph 6.53 about what should be included in floorspace calculation, it is arguably more appropriate to justify recommendations and decisions through reference to value generated by development such as garages rather than consider them to be relevant for floorspace calculation.
39. Whilst garages, and in particular integral garages, might be seen to create risk of expansion of living floorspace, the Authority does not need to assume this is an applicant's intent and arguably has no need to do so. Instead the Authority can consider the scale of the development as a whole including any 'add ons' such as garages as material planning matters in terms of the value created and risk to the future affordability of those properties to local people.

⁷ Supplementary Planning Guidance: Meeting the need for affordable housing in the Peak District National Park

⁸ Appledrop Bradwell case.

⁹ [12 Ways to Add Value to Your Home - Build It \(self-build.co.uk\)](https://www.self-build.co.uk/12-ways-to-add-value-to-your-home/)

40. However, the recent valuation of a more affordable house in Litton Dale shows that even in cases where garages aren't included as part of the development the restricted value of the property is going to be challenging for future occupants to afford¹⁰. In summary the three bed detached house¹¹ with occupancy restriction and no garage was valued at £356,250. This valuation is a requirement of the legal agreement and is done by the District Valuer at the applicant's expense.
41. Such valuations challenge our policy approach because with our current standards on design and materials it seems unsustainable to believe these houses can continue to provide "**more affordable**" housing for local people on low to moderate incomes. This issue will be explored more fully as part of the current local plan review.
42. Moving onto design factors, garages are not an expected and necessary part of affordable housing development. The Derbyshire Dales District Council Housing Manager has previously confirmed that garaging with affordable housing is not a practice that the District Council follow outside the National Park. Indeed beyond the National Park particularly in the urban fringes garaging is not the norm with residents parking on drives or roadside areas. Therefore it is significant to query if garaging is not essential to the majority why would the Authority support garaging where the impacts are so significantly negative upon our core objective of affordability?
43. The layout of all affordable housing schemes includes adequate off road parking in line with the Authority's parking standards¹². There is no need therefore for garages in order to remove vehicles from the highway. In the vast majority of cases therefore garages must be considered an individual preference and not a necessity.
44. This view on garages tallies with those we received from the Homes and Communities Agency¹³ when we were preparing the Development Management policies and considering floorspace requirements. The view is outlined at Appendix 1 of this report.
45. The Local Plan assumes that it was self-evident that certain types of development such as garages would not be acceptable for housing that is restricted in size to improve affordability in perpetuity. As such the starting position in terms of policy application is that garaging will not be accepted unless an exceptional case can be made (as that relating to disability needs described above) and therefore must be factored into the assessment of policy aims when determining a planning application.
46. The best practice approach would be to not attempt a simplistic calculation (ie floorspace + garage = x square metres) except in the case of integrated garaging whereby a fact and degree judgement on design and relationship to the house maybe made, including mode of connection and access.
47. Beyond this the basic inclusion of a garage must be regarded as a feature that will move a property further beyond the realms of affordability which significantly undermines core policy objectives, in particular for potential subsequent occupants within the community.

¹⁰ Valuation Report for, Stanscroft, Litton Dale, Litton, Buxton, SK17 8QN

¹¹ houses applied for by individuals are usually, by definition, single detached houses. Detached houses will generally command higher prices, and this fact also highlights the need for the development itself to be modest in order to improve affordability in perpetuity. The inclusion of other developments such as garages will exacerbate the challenge of preserving some notion of affordability for future generations of people in need of affordable housing.

¹² [Peak District National Park Authority Parking Standards. Appendix 9 Development Management Policies Part 2 of the Local plan for the Peak District National Park.](#)

¹³ Now Homes England

The legal processes and other history that the Authority went through to effect this change of policy and practice and how the public and other consultees were involved in these changes and their responses

48. The report has explained that the issue is interpretation of policy (changed practice) rather than a change of policy. That notwithstanding, to get to the policy position we now have, the Authority went through all the statutory plan making stages in the lead up to plan adoption¹⁴. These were in summary:

Regulation 18 Issues and Preferred Approaches Consultation for Development Management Policies (September to December 2012)

49. This consultation followed a range of meetings and conversations with parishes, housing bodies, farmers, land owners, and other strategic partnerships affecting the national park. All parish councils and parish meetings were consulted, along with all constituent and adjoining councils and other statutory consultation bodies as required by regulations.

50. Owing to the recently adopted Core Strategy in 2011 the starting logic for preferred options was to retain a policy position close to the Development Management style of the former Local Plan from 2001 unless the Core Strategy had changed the underlying principle and intent.

51. Review paused to focus on Supplementary Planning Document for Climate Change and Sustainable Buildings (2013-2015)

Regulation 19 Publication Stage (November 2016 to January 2017 – 10 weeks)

52. The Publication Development Management Policies (DMP) document took full account of all the representations received at the Issues and Preferred Approaches stage. It sought views on the legal compliance, compliance with the Duty to Cooperate and the four tests of soundness of part 2 of the Local Plan for the Peak District National Park (the Development Management Policies document).

53. As the new draft plan was written up it began to reflect new ideas from the previous stage and included new policies on conversions, replacement dwellings and ancillary accommodation in response to the need to support social networks and farming succession. Moreover the plan consolidated much of the approach to affordable housing that was ultimately adopted including updated floorspace requirements but now set into draft policy DMH1 as a key requirement opposed to being in supporting text in the 2001 plan.

Modifications consultation (13 November 2017 to 12 January 2018)¹⁵

54. Following the consultation on the publication version of our Development Management Policies, we made modifications to the plan both to improve its clarity but also to respond to many of the points arising. Before submitting the plan to the Secretary of State the Authority re-consulted to give stakeholders the chance to consider the proposed modifications. This consulted on an initial schedule of modifications addendum and modifications to the submitted Policies Map. Stakeholders were invited to attend the plan hearings (part of plan examination process).

¹⁴ The detail of this process is at

https://www.peakdistrict.gov.uk/_data/assets/pdf_file/0019/72361/DMP-Consultation-Statement.pdf

¹⁵ <http://www.peakdistrict.gov.uk/dmpmodification>

55. This stage allowed officers to work closely with the member Steering Group to respond further to representations and added additional supporting text to explain the scope for flexibility in applying policies e.g. to take people's changing circumstances into account.

Plan Hearings (May 2018)

56. The plan hearings covered those areas of the Plan that the Inspector felt still needed to be addressed. It also allowed stakeholders to speak direct to the Planning Inspector where they felt their concerns had not been addressed and the Inspector agreed that the matter required more justification by the Authority.

Consultation on Main Modifications (10th Dec 2018 - 28th January 2019)

57. Following the completion of the hearing sessions we published a schedule of modifications to the published version of the DMP document.

Adoption of Development Management policies Document (May 2019)

58. The Authority agreed to adopt the Development Management Policies Document as Part 2 of the Local Plan for the Peak District National Park

Key Authority decisions

59. May 2012: Members endorse the Regulation 18 Development Management Issues and Preferred Options¹⁶

60. October 2015: Members endorse the Regulation 19 Draft Development Management Policies Document for consultation¹⁷

61. May 2019: Members agree to adopt the Development Management Policies Document as Part 2 of the Local Plan for the Peak District¹⁸

Member Steering Group

62. This group comprised lead members and had an advisory rather than decision making role. The group's advice informed officer drafting of consultation documents and the final submission plan. The decision to agree documents for consultation and adoption was always that of the full Authority in accordance with standing orders.

Conclusion

63. This paper has addressed the three points described under the heading Purpose of the Paper at the start of this paper.

64. The intention is that new affordable housing should be permitted at a scale to address evidenced housing need and not personal preference. Indeed, when schemes of housing are permitted and built by Housing Associations, the mix of houses addresses the evidence of housing need established through housing need surveys and/or evidence from home options¹⁹ registrations. We should not therefore permit houses of a size and

¹⁶ <https://democracy.peakdistrict.gov.uk/documents/g1262/Printed%20minutes%2025th-May-2012%2010.00%20National%20Park%20Authority.pdf?T=1>

¹⁷ <https://democracy.peakdistrict.gov.uk/documents/g85/Printed%20minutes%2002nd-Oct-2015%2010.00%20National%20Park%20Authority.pdf?T=1>

¹⁸ <https://democracy.peakdistrict.gov.uk/documents/s30070/DMP%20adoption%20bjt%20final.pdf>

¹⁹ [Home Options - Derbyshire Dales District Council](#)

type for which there isn't an evidenced need. There is no sound reason to change the approach for applications from individuals for houses to meet their own housing need. This logic has been followed at Chelmonton recently although this case hinged on impact as much as scheme size²⁰

65. The intention is that these houses serve a community purpose in the long term as being a stock of more affordable houses for second and subsequent owners or tenants from the local area. To be useful to local people who need housing to stay in the area the houses must retain some level of affordability to these people.
66. Whilst the practice under the previous Local Plan and SPG had moved away from policy intent, the current approach attempts to pull that back to the original intent of addressing need and not preference, whilst giving enough flexibility to react to circumstances that justify exceptions. (e.g. disability)
67. The current policy is less than two year's old. It has been subject to examination by the Planning Inspectorate under the NPPF, taking into account the references to protected areas, and the particular reference to affordable housing in the National Park Vision and Circular²¹.
68. The plan was also subject of rigorous scrutiny by stakeholders including housing bodies and an Authority member working group, and the full Authority membership at every statutory stage. This process gave considerable scope for the plan to be amended in the run up to its examination. It was found to be sound at Local Plan examination.

The way forward

69. There are options to minimise and if possible avoid inconsistencies in approach. The options are as follows and are not either/or options. They are:
 1. Prepare a practice note based on the outcome of this paper. This can be done quickly but it would have no status as a plan document.
 2. Prepare an SPD based on the outcome of this paper. This would result in a document with some weight in decision making but it will take longer to produce because of statutory stages required and it will divert officer resources from plan review. It is also likely to prove a short-lived document that would quickly be overtaken by new policy.
 3. Cover the issue comprehensively at plan review taking into account the issues raised in this paper and exploring the problems of high valuations and the issue of ongoing accessibility of these houses to local people on low to moderate incomes. This option also allows us to respond to possible changes, for example in the way people live and work, such as increased home working and the limitations that existing affordable house sizes and configurations put on this. Whilst Covid 19 has heightened awareness of this for many households, the rollout of better broadband means the use of the home for work purposes may become a more common practice. This could have positive impacts for other areas of our work such as the push to reduce car dependency, and harmful emissions from across the National Park and beyond. This example of potential space needed for home working has been raised by Authority members at a recent planning committee and the point has been noted by policy planners.

²⁰ https://democracy.peakdistrict.gov.uk/documents/s40399/1020-0941_AFFORDABLE%20DWELLING%20AT%20CHELMORTON.pdf

²¹ [English National Parks and the Broads UK Government Vision and Circular Defra 2010](#) Page 20-21 paragraphs 76-79 Support the delivery of affordable housing.

4. Ensure policy planners are a statutory internal consultee on planning applications as is the case for cultural heritage staff, landscape officers, tree officers, and ecologists. This is common practice for other local planning authorities, but is not the case here. The decision whether or not to consult policy planners currently lies with the case officer alone. As such, policy planner involvement in cases at consultation stages is limited and discretionary despite the involvement of those officers in the production of the plan policies.

70. The recommended approach is to pursue options 1) ,3) and 4)

Option 1) can become adopted practice immediately. It would lessen the risk of planning policy intent being lost.

Option 3) would mean the issue is reviewed comprehensively as part of the Local Plan review, and would result in new adopted policy in the new Local Plan.

Option 4) would improve decision making, increase consistency of decision making and reduce the scope for policy practice to diverge from policy intent.

(Option 2 is not recommended because it would quickly become redundant and would divert officer resources away from plan review work).

Human Rights

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

RECOMMENDATION:

That the report be noted and options pursued as deemed necessary.

List of Background Papers (not previously published)

Nil