

5. FULL APPLICATION – CONVERSION OF STONE FIELD BARN TO CREATE A THREE-BEDROOM PROPERTY WITH INTEGRATED ONE-BEDROOM ACCOMMODATION FOR USE AS ANNEXE OR HOLIDAY ACCOMMODATION AT BARN OFF BROADWAY LANE, NR PRIESTCLIFFE, TADDINGTON (NP/DDD/0223/0117)/ALN

APPLICANT: MISS ELLIE HENSBY

Summary

1. The application proposed conversion of an historic field barn to a dwelling with integral annexe for occupation as a holiday let or ancillary accommodation.
2. The barn stands in an isolated and prominent countryside location, with the immediate area highly characteristic of the Limestone Village Farmlands landscape character type in which it sits.
3. The conversion would result in significant harm to both the historic agricultural character and significance of the barn and its setting through loss of features and domestication of setting.
4. It would also result in significant domestication of the landscape in this location, harming its rural agricultural character.
5. Other material considerations do not suggest that the application should otherwise be supported.
6. The application is therefore recommended for refusal.

Site and Surroundings

7. The application site is a substantial field barn, situated in an isolated location in open countryside. The nearest settlement is Priestcliffe, a small hamlet located approximately 0.7km to the south west. The immediate landscape setting is open pastoral land with medium scaled fields and fossilised strip fields to the south. The site falls within the Limestone Village Farmlands LCT within the adopted Landscape Strategy. The barn sits in the centre of a small rectangular field parcel and there is a smaller enclosed paddock to the south west.
8. The barn is located at the junction of Bulltor Lane and Broadway Lane. It is understood that Bulltor Lane is a non-classified road, but it does not have a bound surface and is deeply rutted. Broadway Lane to the west of the barn is a public footpath.
9. The barn is of substantial size with a simple gable form. It has two storeys. There is a lean-to off shot on the rear (north) side. The barn dates from the 18th or early 19th century and was a cowhouse with loft over. It is constructed in natural limestone under a blue slate roof. There is a gated access onto Bulltor Lane to the south.

Proposals

10. Planning permission is sought to convert the barn to a single, three bedroomed, open market dwelling, with an annexe at the western end to provide either ancillary accommodation or a one bed holiday let (flexible). There would be an open plan living/dining/kitchen space on the ground floor, together with a living room/kitchen and en-suite bedroom for the holiday let. On the first floor would be three bedrooms and a

family bathroom. The conversion would take place within the shell of the building.

11. Existing openings would be utilised. During the course of the application, amended plans have been submitted showing a large new opening for patio doors on the rear elevation omitted.
12. The plans show that an small enclosed area to the west of the barn would be an 'enclosed garden' with a further area to the south west laid to a 'wild meadow/vegetables'. The large paddock to the between the barn and a proposed stable is labelled as 'grass retained'. An 'oil tank or ground source heat pump' would be sited immediately to the west.
13. The existing vehicular access onto Bulltor Lane would be retained and parking and manoeuvring space provided on a gravel surfaced area to the south of the barn.
14. It was initially proposed to erect a new timber stable block approximately 35m to the north of the barn, in the north west corner of the field parcel, but amended plans have since been submitted, removing this element of the scheme from the proposals.

RECOMMENDATION:

15. That the application be REFUSED for the following reasons:

1. **The proposed conversion would harm the heritage significance of the barn by virtue of domestication of its character and setting, with no material planning considerations outweighing that harm, contrary to policies L3, DMC3, DMC5, and DMC10, and to the heritage provisions of the NPPF.**
2. **The proposed conversion would harm the special landscape character of the locality by virtue of domestication of the barn and its rural agricultural setting, with no material planning considerations outweighing that harm, contrary to policies L1, DMC3, and DMC10, and to the provisions of the NPPF insofar as they relate to landscape protection within National Parks.**

Key Issues

- Principle of Development
- Impact on the significance of the heritage asset.
- Landscape and Setting Impacts.
- Highways
- Ecological considerations
- Climate change mitigation

History

16. 2017 – pre-application enquiry submitted about the possibility of converting the barn to an open market dwelling. Enquirer advised that due to the isolated location of the barn, the impact of a residential use on the setting of the barn would cause harm to the landscape of the National Park and would be unlikely to be looked upon favourably.

Consultations

17. **Highway Authority** – no highway safety objections subject to the provision of on-site parking and turning & manoeuvring area as shown on the submitted plans.
18. **District Council** – no response
19. **Parish Council** – Objects – *‘The barn occupies a prominent and exposed position in a landscape of exceptional value that should be safeguarded because of its intrinsic scenic beauty. It is felt that the current proposals fail to meet/ achieve this objective. In addition, the proposed residential conversion of the barn would spoil its character and setting. Also, in its current form, the application would not achieve conservation or enhancement of the barn given the significant amount of rebuilding required for its conversion and also the introduction of a domestic use, associated developments (stables) and no doubt equestrian facilities in this sensitive location.’*
20. *The proposals would therefore be contrary to core strategy policies. In this case, by virtue of its remote and isolated location in open countryside and by virtue of the harmful impacts associated with the barn conversion, the benefits of granting planning permission for the development proposals would be significantly and demonstrably outweighed by the adverse impacts of doing so. Therefore the proposals are contrary to the principles of sustainable development set out in national planning policies.’*
21. **Authority’s Ecologist** – No objections subject to the measures set out in the submitted protected species report being followed, and to additional conditions to mitigate impacts and secure ecological enhancement.
22. **Authority’s Archaeologist** – (in summary – full response available on file). The barn is a non-designated heritage asset of regional significance. The barn is an unusually unaltered late 18th or early 19th century cowhouse with hay loft over that function as a field barn, allowing and remote from the home farmstead to be managed efficiently by avoiding the need for stock or produce to be brought back to the main farmstead. Field barns are a highly characteristic element of the Peak District landscape and contribute strongly to local distinctiveness.
23. Its historic interest lies in external elevations, its apertures (legibility of historic function) high level of survival of historic layout, fixtures and fittings internally (legibility of historic function) including floorplan, 19th century hay cratches and boskins, open character of hayloft, reused historic timbers in the roof (mortice visible in one of the heritage statement photos), surviving original hayloft ladder. The historic layout of the barn and its historic features have survived the insertion of later upgrades including a concrete floor, some ceramic feed troughs and automatic water spouts.
24. Its landscape setting makes a positive contribution to its significance, particularly the historic dewpond and the relationship of the barn to its fieldscape on the boundary between the ancient enclosure with surviving features of medieval strip farming and post-medieval parliamentary enclosure and changing agricultural practice over time.
25. With regard to impacts, confirms that the scheme would cause some harm to the significance of the heritage asset. The revised scheme works well with external elevations, but does not work well with the internal features. The hayloft areas, currently open within the bays are proposed to accommodate most of the bedrooms and with the loft spaces proposed to be subdivided, and the groundfloor in the east-west range, currently subdivided by walls and boskins is proposed to become an open plan living space, and historic fixtures and fittings lost across the groundfloor.
26. Given the relatively rare survival of the 19th century internal features, fixtures and fittings

and that in most Peak District barns they have largely been replaced by modern fittings and concrete floors, the Authority should be seeking a scheme that accommodates and retains at least some of these significant features. Historic England guidance and advice on Adapting Traditional Farm Buildings is that 'Machinery and internal fittings provide important evidence of a building's former use and some are now very rare.

27. The benefit of securing the future of this non-designated heritage asset is acknowledged, as is the way that the scheme has worked with the external elevations and apertures. But, I firmly believe a scheme that works more successfully to retain the planform on the ground floor (e.g. not creating an open plan living space; not wholly removing any walls but creating openings within them, or leaving stubs in places to retain legibility; retaining some boskin dividers); retaining the and the open character of the loft areas at first floor, and retaining elements of historic fixtures and fittings internally is possible, and would result in a conversion scheme that would more successfully conserve the significance of the heritage asset.
28. With respect to the historic landscape, in its current form and use the site is integrated within its surrounding agricultural landscape, and it owes its existence and position to the way this landscape, enclosure and farming practice has developed. The introduction of a residential and domestic use into this location within this historical landscape, with everything this entails (domestic curtilage and paraphernalia, parking, provision of services, light pollution, movement of vehicles, provision of a bin store, the stables etc.) would introduce elements that are out of place, incongruous and are harmful to this heritage asset, and given its location and position in the landscape this cannot be mitigated.
29. **Authority's Landscape Architect** – The application site is located within the Limestone Village Farmlands LCT in the White Peak LCA. It is not located in s3 land.
30. This is a small-scale settled agricultural landscape characterised by limestone villages, set within a repeating pattern of narrow strip fields bounded by drystone walls.
31. Its key characteristics are:
 - A gently undulating plateau
 - Pastoral farmland enclosed by drystone walls made from limestone
 - A repeating pattern of narrow strip fields originating from medieval open fields
 - Scattered boundary trees and tree groups around buildings
 - Discrete limestone villages and clusters of stone dwellings
 - Relict mine shafts and associated lead mining remains
 - Localised field dewponds
32. Tree cover is largely restricted to small groups of trees and a scattering of trees along boundaries around village margins, often creating quite intimate rural scenes. Elsewhere the landscape is often more open, but even here more distant views are typically framed by surrounding hills, or rising ground.
33. The farmed landscape is characterised by a sub-regular pattern of small to medium sized fields enclosed by drystone walls built out of the local pale coloured limestone. Large areas of narrow fields exist in many places, reflecting piecemeal enclosure of strips in the former open fields from late medieval times onwards. Field pattern tends to be a fairly prominent element in this landscape, creating a strong sense of scale and visual unity.
34. The present settlement pattern is long established within this landscape, with origins before the Norman Conquest, and tends to be strongly nucleated, with most farmsteads

and dwellings concentrated into a central village within each parish, reflecting historic townships.

35. There is a very distinctive and unified settlement character and isolated domestic properties are not a characteristic feature – and insensitive conversion has the potential to result in adverse effects on the special landscape character within the national park.
36. This is a relatively isolated field barn in a relatively open landscape, with some groups / lines of trees in the surrounding landscape.
37. No LVA is included with the application (so it's potential effects on surrounding landscape character and views have not been included in the application). There also is not a landscape plan included (which shows the outside treatment of the landscape within the red line boundary), so there is no mitigation or enhancement proposals included. Given the potential for adverse effects, these are a significant omission and I object to the application on the grounds of a lack of information.
38. The D&AS states 'the proposal will try not to incorporate a domestic garden' – this is too vague a statement and seems unenforceable? Where are washing lines etc to be located? The proposals show car parking within the gravel farmyard area, but for how many cars and how visible would they be? These domestic elements have the potential to create significant visual 'clutter' and their location needs to be defined, as does any potential mitigation (such as tree planting, drystone walls etc) to screen them.
39. The D&AS also states 'A wildflower and bat friendly planting scheme can be incorporated as recommended by the ecology consultants.' This needs to be defined and included within the submission.
40. There is no mitigation or enhancement defined within the application so I do not believe it complies with Policy L1 conserve and enhance valued landscape character, as identified in the Landscape Character Assessment and other valued characteristics.

Representations

41. Thirty eight letters of support have been received raising the following points (in summary – the full letters can be read on the application file):
 42. Restoring and converting the barn will conserve a building of heritage significance.
 43. Re-purposing old barns reduces the need for new build housing development.
 44. There is a housing shortage in the area.
 45. Proposals will help a local person stay in the area.
 46. The building is redundant for agricultural purposes and will fall into disrepair if not developed.
 47. Policy HC1 supports the conversion of such buildings.
 48. There are precedents on other barns in the National Park.
 49. The proposals will be of benefit to the local community.
 50. Proposals are sympathetic to the character of the barn.

Main Policies

51. Relevant Core Strategy policies: GSP1, GSP2, GSP3, DS1, HC1, L1, L2, L3
52. Relevant Local Plan policies: DMC3, DMC5, DMC10, DMC12, DMR4, DMT3, DMT8,

National Planning Policy Framework

53. The National Planning Policy Framework (NPPF) replaced a significant proportion of central government planning policy with immediate effect. The Government's intention is that the document should be considered to be 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 the East Midlands Regional Plan 2009, the Authority's Core Strategy 2011 and saved policies in the Peak District National Park Local Plan 2001. Policies in the Development Plan provide a clear starting point consistent with the National Park's statutory purposes for the determination of this application. It is considered that in this case there is no significant conflict between prevailing policies in the Development Plan and more recent Government guidance in the NPPF with regard to the issues that are raised.'
54. Paragraph 115 of the Framework says that great weight should be given to conserving landscape and scenic beauty in National Parks and that the conservation of wildlife and cultural heritage are important considerations and should also be given great weight.

Core Strategy

55. Policy DS1 sets out the Development Strategy for the National Park. Agricultural development is acceptable in principle in the open countryside outside of the natural zone.
56. Core Strategy policy GSP3 states that development must respect, conserve and enhance all valued characteristics of the site and buildings that are subject to the development proposal.
57. Policy HC1. C I and II states that exceptionally new housing will be permitted in accordance with core policies GSP1 and GSP2 if it is required in order to achieve conservation and/or enhancement of valued vernacular or listed buildings or where it is required in order to achieve conservation or enhancement within designated settlements.
58. Core Strategy policy L1 states that development must conserve and enhance valued landscape character, as identified in the Landscape Strategy and Action Plan and other valued characteristics.
59. L2 states, amongst other things that development must conserve and enhance any sites, features or species of biodiversity importance and where appropriate their setting.
60. Core Strategy policy L3 requires that development must conserve and where appropriate enhance or reveal significance of archaeological, artistic or historic asset and their setting, including statutory designation and other heritage assets of international, national, regional or local importance or special interest.
61. Core Strategy Policy CC1 states that development must make the most efficient use of land, buildings and natural resources and take account of the energy hierarchy.

Development Management Policies

62. Policy DMC3 expects a high standard of design that respects, protects and where possible enhances the natural beauty, quality and visual amenity of the landscape.

63. Development Management policy DMC5 states that applications affecting a heritage asset should clearly demonstrate its significance including how any identified features will be preserved and where possible enhanced and why the proposed works are desirable or necessary. Development of a heritage asset will not be permitted if it would result in harm to, or loss of significance character and appearance unless the harm would be outweighed by public benefit.
64. Policy DMC10 states that the conversion of a heritage asset will be permitted provided that it can accommodate the new use without changes that would adversely affect its character (such changes include significant enlargement, or other alteration to form and mass, inappropriate new window spacings or doorways, major rebuilding); and the building is capable of conversion without compromising the significance and character of the building; and any new use conserve or enhancement the asset; and the new use of the building would not be visually intrusive in its landscape or have adverse impact on tranquillity, dark skies or other characteristics.
65. DMC12 states that with regard to protected species development will only be permitted where significant harm can be avoided and the conservation status of the species is maintained and the need for and the benefits of the development clearly outweigh any adverse effect.
66. Policy DMR4 allows for facilities for the keeping and riding of horses provided that the development does not detract from the landscape or valued characteristics of the area, is located adjacent to existing building or groups of building, is not likely to cause road safety problem and does not constitute a nuisance to neighbours.
67. Development Management Policy DMT3 states the development will only be permitted where, having regard to the standard, function, nature and use of the road, a safe access that is achievable for all people, can be provided in a way that does not detract from the character and appearance of the locality and where possible enhances it.
68. Development Management Policy DMT8 states that off-street parking for residential development should be provided unless it can be demonstrated that on-street parking meets highways standards and does not negatively impact on the visual and other amenity of the local community. It notes that the design and number of parking spaces must respect the valued characteristics of the area, particularly in conservation areas.

Assessment

Principle of Development

69. The relevant housing policy is Core Strategy policy HC1. This policy continues the Authority's long standing policy position that housing will not be permitted solely to meet open market demand. This approach is consistent with the National Park Circular and the NPPF.
70. Core Strategy policy HC1 sets out the exceptional circumstances in which new housing will be permitted in the National Park. The approach of allowing affordable housing and workers housing where there is an established need, and, of allowing market housing where it is required to achieve significant conservation and enhancement in accordance with policies GSP1 and GSP2 is considered to be a sustainable approach for providing housing within the National Park without undermining the landscape and valued characteristics.
71. The building is not listed. It is therefore necessary to establish whether the building

constitutes a non-designated heritage asset. A heritage statement has been provided during the course of the application. This confirms that the building has archaeological, architectural and historic interest sufficient that it is considered to be a non-designated heritage asset. We agree with that assessment. The internal fixtures and fittings, together with the barn's setting contribute to its significance.

72. A structural survey has been submitted which confirms that the general condition of the structural fabric is reasonable and conversion can be carried out without any demolition and re-build. There are some obvious signs that the building has been repaired in recent years, e.g. the roof, the majority of which has been recovered with clay tiles. The roof supports have also been found to be in a generally sound condition.
73. Despite this sound general condition the longer term conservation of the building remains an important consideration. As such the conversion of the property to an open market dwelling is acceptable in principle and in accordance with HC1, subject to considerations of matters such as impacts on heritage significance, landscape impacts and ecological considerations.
74. Policy RT2 addresses holiday accommodation, supporting this in principle through conversion of buildings of historic and vernacular merit. The sometime-use of the proposed annexe for this purpose would therefore accord with adopted policy in principle.
75. For clarity, this application is not for an affordable house to meet an identified local need or for a farm workers dwelling, it is for an open market dwelling. A lot of weight has been given by third parties who have supported the application to the applicant's local connections, however it must be stressed that the application does not propose a dwelling that would have a local occupancy restriction. The Authority would have no control over future occupiers and whether or not they would have any local connection. In any case, with an internal floor area well in excess of the maximum permissible floorspace set out in policy for even for a 5 person affordable dwelling, the property would be very unlikely to remain affordable to those on low to moderate incomes anyway.

Design and Impact of alterations on Heritage Significance

76. The submitted Heritage Assessment recognises the value of the barn as an early 19th century field barn. It states that its age, location and isolation are contributors to its heritage significance alongside its functional vernacular architecture and its internal fixtures.
77. The simple character and traditional utilitarian livestock shelter functionality remains intact with a strong prominence in the immediate landscape setting, separated in visual context from any other building. The building, whilst subject to some limited modern interventions and repairs (e.g. a new roof covering in blue slate) remains of a simple, substantial, solid and undiluted upland field barn character.
78. Externally the proposals are largely sympathetic to the character of the barn. The submitted plans showed a large new patio doorway on the north elevation but this has now been omitted. The proposal as amended now wholly uses existing openings. Doors would be largely fully glazed but simple frame designs for all openings would reflect the functional character of the barn. The application form states that windows and doors would be either timber or upvc. Upvc would be wholly inappropriate in this setting and traditional timber frames would be required. If the application were acceptable in all other respects a condition would be required to ensure the use of timber and to agree the final finish. A flue pipe would extend up the north facing wall

and above the roof at the eaves. It would be preferable if the pipe could be routed internally until it reaches roof level to reduce its impact on the character of the barn.

79. Internally, as described in the Heritage Assessment and by the Authority's Archaeologist, there are original 19th century fixtures. This is relatively rare, as in most barns they have been replaced by modern fittings and concrete floors. At ground floor level the historic timber stall dividers, hayracks and ceramic troughs, surviving hayloft ladder, all remain and are very attractive features. At first floor level the hayloft is open within each of the three bays. The proposals would see the removal of all of the historic features at ground floor level, in order to create open plan living accommodation. At first floor the open hayloft would be subdivided to create bedrooms/en-suite/bathroom spaces.
80. Officers concur with the Authority's archaeologist that a scheme that better conserves the internal character of the building is required, and is perfectly feasible. For example, the living accommodation could be reversed with the bedroom accommodation (which requires more subdivision) sited on the ground floor, and the more open plan living accommodation within the open lofts space above. This would better preserve the historic plan form of the building. And as advised by Historic England, with some ingenuity, at least some of the historic fixtures and fitting could be retained. As submitted however, the scheme would harm the character and significance of the barn in these respects and is contrary to policies HC1, DMC5 and DMC10.

Landscape and Setting Impacts and proposed stables

81. The barn stands in an isolated and prominent plateau location. The immediate area is highly characteristic of the Limestone Village Farmlands landscape character type in which it sits. The protection of historic field barns is set out as a priority within the landscape strategy for this area.
82. The site is considerably removed from other settlement and has a tranquil, pastoral character. The adjacent Bulltor Lane, whilst being an adopted highway, appears to be little used by vehicular traffic. It is unsurfaced and has a rural character as a quiet green lane. The barn and its immediate setting are very prominent from both Bull Tor Lane and the public footpath adjacent to the site to the west. The barn and its fieldscape setting is an important historic element of the immediate landscape.
83. The Authority's Landscape Architect advises that the scheme has the potential to result in adverse landscape impacts and objects to the lack of an LVA being provided. They do however go on to make an assessment of the impacts of the development in so far as they are able, based on the information provided. They identify the barn as isolated within open landscape, and that the potential for harm arises from domestication of setting – querying whether the applicants intent to 'not integrate a domestic garden' appears vague and unenforceable.
84. We agree, and having visited and walked the site are of the view that a full assessment of impact is possible without reliance on an LVA document in this instance. This is because the building is already present in the landscape, officers are familiar with the elements of domestication that would arise from the development, and because key views of the building are evident and accessible on the ground.
85. In looking at the building in its current form and use as part of that assessment, the site is integrated within its surrounding agricultural landscape, and it owes its existence and position to the way this landscape, enclosure and farming practice has developed. The introduction of a residential and domestic use into this location within this historic landscape, with everything this entails (domestic curtilage and paraphernalia, parking,

provision of services, light pollution, movement of vehicles, provision of a bin store, etc.) would introduce elements that are out of place, incongruous and are harmful to the setting of this heritage asset.

86. Occupation of the barn would result in internal lighting being apparent in hours of darkness within an extensively open location away from other light sources. Internal lighting is likely to be visible in hours of darkness through windows in an otherwise dark landscape. This is not likely to be reasonably or effectively controlled by condition. External lighting would also cause harm.
87. The parking and garden areas, with their associated cars, domestic landscaping, and domestic furniture etc would be screened partially by the drystone boundary walls, but they would still be clearly seen in views over the walls from the adjacent rights of way. Such visibility should be considered against the existing lawful use of the barn as an agricultural building and curtilage, within which it would be expected tractors, trailer or other farm machinery and storage of wrapped bails etc. which would also be prominent. However these features are a more accepted part of an agricultural landscape and do not have the same impacts on the overall character of the landscape or the barn itself – as the domestic paraphernalia described above.
88. As noted by the Landscape Architect, landscaping mitigation proposals do not form part of the application. Nonetheless, it is difficult to see how such proposals could address the landscape and setting harm identified above. Notwithstanding that any scheme for planting would take a number of years to establish, the enclosure of the barn with surrounding planting to screen it in the wider landscape would in itself be inappropriate; it would effectively remove the contribution the barn makes to the character of the landscape in this location. Further, given the relatively open character of the land and extent and grouping of planting that would be required to provide effective screening, the planting itself would likely appear out of place in this landscape, causing harm to its open character.
89. In conclusion the proposed scheme would cause harm to the landscape setting of the barn contrary to policies L1, L3, DMR3 and DMC10.

Ecological Considerations

90. The initially submitted survey and report indicated that further bat surveys were required. These have since been carried out, and found no evidence of bat roosting. Further assessment of great crested newt habitat also found that this would be unaffected. Mitigation and enhancement by way of bird nesting opportunities is proposed. Subject to conditions to ensure appropriate working methods and to secure the mitigation measures, the proposals therefore do not give rise to objection on ecological grounds, according with adopted policy.

Highway impacts

91. In the context of the current use of the site, the proposed use would not result in such intensification of use to give to highway safety or amenity concerns; whilst served by a single width track, the likelihood of conflict with other traffic is low. The track is of sufficient width and visibility that the use would not pose a safety risk to other users of the right of way. Further, the highway authority raise no objections to the proposals. The development is therefore concluded to be acceptable in relation to associated highway impacts.

Climate Change Mitigation

92. The submitted sustainability statement discusses the inherent sustainability of re-using an existing building, and states that ‘a range’ of renewable heating and hot water solutions will be incorporated. This is not sufficiently precise to ensure compliance with policy CC1. However, had the development have been acceptable in other regards then a condition to secure climate change mitigation measures could have been imposed to achieve this.

Conclusion

93. The principle of converting the building to an open market dwelling and annexe/holiday let accords with policy in principle.
94. However, the scheme would result in significant harm to the historic significance and agricultural character of the barn and its setting within the landscape.
95. On that basis, in making a balanced judgement on the proposals as required by policy DMC5, we conclude that the benefits arising from the conversion, being the long term retention of the building, are limited given the harm that would arise to its character, and they fail to outweigh the identified harm that would arise from the development.
96. There are no other policy or material considerations that would indicate that planning permission should be granted, and the application is therefore recommended for refusal.

Human Rights

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

List of Background Papers (not previously published)

98. Nil

Report Author and Job Title

99. Mark Nuttall – Principal Planner - South