

<b>MEETING:</b>	<b>PLANNING COMMITTEE</b>
<b>DATE:</b>	<b>7 DECEMBER 2016</b>
<b>TITLE OF REPORT:</b>	<p><b>151584 - PROPOSED RESIDENTIAL DEVELOPMENT FOR THREE DETACHED AND FOUR SEMI DETACHED DWELLINGS WITH MODIFIED VEHICLE ACCESS TO B4361 AT LAND ADJACENT TO BRICK HOUSE, LUSTON, HEREFORDSHIRE, HR6 0EB</b></p> <p><b>For: Mr Stephens per Mr DF Baume, Hook Mason Limited, 41 Widemarsh Street, Hereford, Herefordshire, HR4 9EA</b></p>
<b>WEBSITE LINK:</b>	<a href="https://www.herefordshire.gov.uk/planning-and-building-control/development-control/planning-applications/details?id=151584&amp;search=151584">https://www.herefordshire.gov.uk/planning-and-building-control/development-control/planning-applications/details?id=151584&amp;search=151584</a>
<b>Reason Application submitted to Committee - Redirection</b>	

**Date Received: 26 May 2015**  
**Expiry Date: 24 July 2015**

**Ward: Bircher**

**Grid Ref: 348590,263099**

Local Member: Councillor WLS Bowen

## **1. Site Description and Proposal**

- 1.1 The site is accessed off the western side of the B4361 road opposite The Balance Inn, Luston. The area of ground relating to the proposal is currently accessed via a driveway on the northern side of Brick House that fronts onto the class II road. The site is screened at present by a line of evergreen trees adjoining a pavement. There is also a bungalow (Meadow View) with a shallow rear garden, but with further garden area to the side (south). There is a line of trees /hedgerow on the western side of the site that are protected by a Tree Preservation Order (TPO) these extend north and south along what constitutes the western boundary of the Conservation Area. A public footpath adjoins the northern boundary, it is well screened from the site and at a lower level. The site is within Luston Conservation Area.
- 1.2 The proposal is for seven dwellings. A detached two bedroom dwelling will be erected on the northern side of a new splayed entrance with visibility of 90 metres in each direction i.e north and south along the B4361 road. A pair of 3 bedroom dwellings will be sited on the northern side of the site they will face southwards to a matching pair across a shared driveway. The southern pair of 3 bedroom semi-detached dwellings will have a rear boundary shared with the Hollies. The two remaining dwellings are detached 4 bedroom units and fill in the south-western and north-western areas of the site i.e adjoining the boundary protected by the TPO. The facing materials used throughout will comprise part stone, render and timber boarding under plain tiled roofs. The windows will be timber and painted.

- 1.3 The proposal has been amended such that three car park spaces are provided for the two 4 bedroom properties, as originally only two spaces were proposed. Also secure cycle storage is now provided for each dwelling. This revision was submitted following receipt of the advice of the Transportation Manager.

## 2. Policies

### 2.1 The Herefordshire Local Plan - Core Strategy

SS1	-	Presumption in Favour of Sustainable Development
SS2	-	Delivering New Homes
SS3	-	Releasing Land for Residential Development
SS4	-	Movement and Transportation
SS6	-	Environmental Quality and Local Distinctiveness
RA1	-	Rural Housing Strategy
RA2	-	Herefordshire's Villages
H1	-	Affordable Housing – Thresholds and Targets
H3	-	Ensuring an Appropriate Range and Mix of Housing
MT1	-	Traffic Management, Highway Safety and Promoting Active Travel
LD1	-	Landscape and Townscape
LD2	-	Biodiversity and Geodiversity
LD3	-	Green Infrastructure
SD1	-	Sustainable Design and Energy Efficiency
SD3	-	Sustainable Water Management and Water Resources
SD4	-	Wastewater Treatment and River Water Quality

### 2.2 NPPF

The following chapters are of particular relevance to this proposal:  
Introduction - Achieving sustainable development

Section 4 - Promoting sustainable communities

Section 6 - Delivering a wide choice of high quality homes

Section 7 - Requiring good design

Section 8 - Promoting healthy communities

Section 11 - Conserving and enhancing the natural environment

Section 12 - Conserving and enhancing the historic environment

### 2.3 Neighbourhood Planning

The Neighbourhood Plan area for Luston was designated on 4 September 2013. The plan has reached Regulation 14 stage and whilst it is a material consideration it is not sufficiently advanced to attract weight for the purposes of determining planning applications.

- 2.4 The Core Strategy policies together with any relevant supplementary planning documentation can be viewed on the Council's website by using the following link:-

<https://www.herefordshire.gov.uk/planning-and-building-control/planning-policy/core-strategy/adopted-core-strategy>

## 3. Planning History

- 3.1 None

## 4. Consultation Summary

### Statutory Consultations

#### 4.1 Historic England

The proposed scheme will take place within the Luston Conservation Area and the statutory requirement to pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area (s.72, 1990 Act) must be taken into account by your authority when making its decision.

Development within this site should seek to promote or reinforce the local distinctiveness of the Conservation Area in line with NPPF paragraphs 58 to 61. This should be reflected in the materials, rhythm, style of architectural details and form of the proposed development. And we therefore advise you to consider whether the proposed design takes these matters into consideration.

If you are minded to approve the application, conditions should be imposed requiring your council's prior approval of architectural details, materials and finishes.

#### 4.2 Welsh Water

No objection subject to conditions controlling the separation of foul and surface water drainage in recommended conditions

### Internal Council Consultations

4.3 Transportation Manager:- Following submission of amendments now recommend conditions on any approval.

4.4 Conservation Manager (Historic Buildings):-, I confirm that in my opinion the proposed development, when assessed against NPPF guidance and s66 (1) and s72 of the Planning (Listed Buildings and Conservation Areas ) Act 1990, would have a neutral effect upon the significance of the setting of the adjacent listed building or conservation area. The site is set well back from the road and is screened by the street front building and by mature trees and in this part of the village the established pattern includes similar examples of this type of residential development

4.5 Conservation Manager (Ecology) has no objections subject to habitat enhancement being carried out in accordance with a recommended attached planning condition.

4.6 Land Drainage Manager has no objection subject to conditions

We are confident that an appropriate drainage system can be installed for the management of surface water runoff from this development without increasing flood risk to people and property elsewhere. This is on the basis that infiltration is promoted as far as practicable and this information is provided as follows :

- **A detailed surface water drainage design, including drainage layout drawings and demonstrating how discharges from the site are restricted to no greater than pre-developed rates.**
- **A detailed foul water drainage design, showing the location of the connection into the mains sewer.**
- **Evidence of groundwater levels a minimum of 1m below the base of any infiltration devices and/or unlined attenuation structures.**

- Details of provisions to protect the site against flooding during extreme events that may overwhelm the surface water drainage system and/or a result of blockage.
- Details of any outfall structures to Luston Brook.
- Confirmation of who will be responsible for the adoption and maintenance of the surface water drainage system.

4.7 Conservation Manager (Archaeology) has no objections

## 5. Representations

5.1 Luston Group Parish Council object

Luston Group Parish Council is opposed to the planning application on the grounds of housing density, the location of the site outside the settlement boundary and drainage. A May 2014 questionnaire undertaken as part of the neighbourhood development plan for Luston Group found that the overwhelming majority of people living locally want to see the settlement boundary retained and smaller developments which are restricted to 3-5 properties maximum. The seven houses proposed will be in small plots that are out of character with surrounding properties, and mean the houses are sited to overlook neighbouring properties such as Meadow View, The Hollies and Brick House. Drainage is a significant concern, as it is proposed that surface water run-off will drain into Luston Brook which overflowed in 2007 causing extensive local flooding to property. The proposal for surface water run off to use the brook will reduce the capability of the existing conduits through the village to cope at times of heavy or sustained rainfall. For these reasons, the parish council recommends the planning application is refused

Luston Group Parish Council object (following receipt of revised plans)

Luston Group Parish Council supports the development of the site in principle, but considers the planning application as it stands will lead to the over-development of the plot. The space available means the proposed houses will be in small plots out of character with surrounding properties, and will overlook neighbouring properties such as the Hollies. In addition, the draft neighbourhood development plan, based on a community wide questionnaire and extensive consultation, supports developments of up to 3-5 properties.

With regard to drainage, the parish council remains to be convinced that the solution(s) under discussion will be a) effective and b) properly maintained over time, and strongly urges that an effective drainage solution will require provisions to ensure its proper maintenance through a management company or adoption by Herefordshire Council or Welsh Water. It is vital that surface water run off from the site does not increase the flow of water into the brook at Luston, which overflowed in 2007 and flooded neighbouring properties.

To ensure it is properly maintained, the parish council also urges that the short access road to the proposed site is adopted by Herefordshire Council.

The parish council would like to understand why the planning application is taking such a long time to be determined. It has been more than a year since the parish council was first consulted on the planning application.

5.2 12 letters of objection and 2 of support have been received making the following points

### Objection

- Out of keeping with historical context
- Loss of open space , loss of grazing area
- 4-5 dwellings as per Neighbourhood Development Plan
- Flooding from Luston Brook, viability of storage tank attenuation

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Further information on the subject of this report is available from Mr A Prior on 01432 261932

- Dwellings overbearing and prosaic straight lined layout
- Overlooking and loss of privacy
- Contravenes space conventions i.e between dwellings and existing properties and between new dwellings in scheme
- Not sustainable location, only school and even if public house open not a facility
- Traffic speed is an issue, poor access
- Appeal and cost concerns should not prevent refusal

#### Support

- In line with Parish survey-what we need
- Good reduction from 14 to 7 dwellings but outside of settlement boundary

5.3 The consultation responses can be viewed on the Council's website by using the following link:-

<https://www.herefordshire.gov.uk/planning-and-building-control/development-control/planning-applications/details?id=151584&search=151584>

Internet access is available at the Council's Customer Service Centres:-

<https://www.herefordshire.gov.uk/government-citizens-and-rights/customer-services-enquiries/contact-details?q=customer&type=suggestedpage>

## 6. Officer's Appraisal

### Policy Context

6.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states as follows:

*"If regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise."*

6.2 In this instance the Development Plan for the area is the Herefordshire Local Plan - Core Strategy (CS). A range of CS policies, referred to at section 2.3, are relevant to development of this nature. The strategic Policy SS1 sets out a presumption in favour of sustainable development, reflective of the positive presumption enshrined in the NPPF. SS1 confirms proposals that accord with the policies of the Core Strategy (and, where relevant other Development Plan Documents and Neighbourhood Development Plans) will be approved, unless material considerations indicate otherwise.

6.3 As per the NPPF, the delivery of sustainable housing development to meet objectively assessed needs is a central Core Strategy theme. Policy SS2 'Delivering new homes' confirms that Hereford, with the market towns in the tier below, is the main focus for new housing development. In the rural areas new housing development will be acceptable *"where it helps to meet housing needs and requirements, supports the rural economy and local services and facilities and is responsive to the needs of its community."*

6.4 The local authority is currently failing to provide a 5 year Housing Land Supply, plus a 20% buffer, which must be met by all local authorities in accordance with paragraph 47 of the NPPF. Paragraph 49 of the NPPF states that *'relevant policies for the supply of housing should not be considered up to date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites'*.

6.5 Irrespective of the weight to be ascribed to the Core Strategy housing supply policies, it is useful to review the application in context. Luston is identified as one of the rural settlements within the Leominster Housing Market Area (HMA). These settlements are to be the main focus of proportionate housing development in the rural areas. The strategy set out at Core Strategy Policy RA1 is to ascribe an indicative housing growth target for the settlements listed within each rural HMA. Within the Leominster rural HMA the indicative minimum housing growth is 14%. The minimum indicative growth target for Luston Group Parish between 2011 and 2031 is

55 dwellings, with 17 commitments or completions and therefore this leaves a minimum residual number of 38 dwellings.

6.6 The preamble to RA2 – Housing in settlements outside Hereford and the market towns states:

*“Within these [figure 4.14] settlements carefully considered development which is proportionate to the size of the community and its needs will be permitted.”* The proactive approach to neighbourhood planning in Herefordshire is also noted and that when adopted, Neighbourhood Development Plans (NDPs) will be the principal mechanism by which new rural housing will be identified, allocated and managed. Luston Group Parish Council has not progressed the NDP. Accordingly, the Neighbourhood Plan is not presently sufficiently advanced to be attributed weight for the purposes of decision-taking and planning applications cannot, in these circumstances, be refused because they are potentially prejudicial to the neighbourhood plan.

6.7 However, and particularly until NDPs are adopted, RA2 is positively expressed insofar as housing proposals will be permitted where the four criteria of the policy are met. Moreover, the Inspector’s Main Modification 038 confirms that in the period leading up to the definition of appropriate settlement boundaries i.e. until such time as NDPs define a settlement boundary, the Council will *“assess any applications for residential developments in Figure 4.14 and 4.15 against their relationship to the main built up form of the settlement.”* Thus with the NDP not yet attracting weight, policy RA2 is key to assessment of planning applications that deliver housing in the rural settlements.

6.8 Policy RA2 states that housing proposals will be permitted where the following criteria are met:

- *Their design and layout should reflect the size, role and function of each settlement and be located within or adjacent to the main built up area. In relation to smaller settlements identified in fig 4.15, proposals will be expected to demonstrate particular attention to the form, layout, character and setting of the site and its location in that settlement; and/or result in development that contributes to or is essential to the social well-being of the settlement concerned.*
- *Their locations make the best and full use of suitable brownfield sites wherever possible.*
- *They result in the development of high quality, sustainable schemes which are appropriate to their context and make a positive contribution to the surrounding environment and its landscape setting.*
- *They result in the delivery of schemes that generate the size, type, tenure and range of housing that is required in the particular settlement, reflecting local demand.*

6.9 This proposal needs to be assessed against it can be seen that Policy RA2 as regards the context of the site, whether or not it is a sustainable location and makes a positive contribution to the settlement.

6.10 This application also needs to be determined in accordance with policies relating to the setting of a listed building and the designated Conservation Area, the biodiversity of the site, the means of access from the B4361 road and the impact on the amenity of residents living in the vicinity of the site.

6.11 The site is centrally located in the settlement of Luston and is, having regard to the NPPF and CS, a sustainable location as confirmed by its listing within RA2.

6.12 The contribution the development would make in terms of jobs and associated activity in the construction sector and supporting businesses should also be acknowledged as fulfilment of the economic role. In providing a greater supply of housing and breadth of choice officers consider that the scheme also responds positively to the requirement to demonstrate fulfilment of the social dimension of sustainable development.

## Heritage Assets

- 6.13 Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states *“In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”*
- 6.14 Section 72(1) and(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states *“In the exercise, with respect to any buildings or other land in a conservation area, of any powers under any provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area”.*
- 6.15 NPPF section 12 sets out the position regarding conserving and enhancing the historic environment. Specific principles and policies relating to the historic environment and heritage assets and development are found in paragraphs 126 – 141.
- 6.16 The proposal site is within Luston Conservation Area, a heritage asset and is within the setting of a listed building to the south (The Hollies, a grade II listed property) and therefore the proposal needs to be determined in accordance with Policies SS6 (environmental quality and local distinctiveness), LD1 (landscape and townscape), LD2 (biodiversity and geodiversity), LD3 (green infrastructure) and LD4 (historic environment and heritage assets) are broadly consistent with Chapters 11 and 12 of the NPPF.
- 6.17 This proposal adjoins the built form of Luston and is well contained within three established boundaries to the north (the public footpath) , the western boundary protected by a TPO and the southern boundary defined by trees and vegetation This is not an historic site in the sense that that it falls within the curtilage of a listed building and the proposal will have a neutral impact in this part of the Conservation Area and in turn the setting of the grade II listed building to the south of the site as confirmed by the Conservation Manager (Historic Buildings). It is also not of archaeological interest , as confirmed by the Conservation Manager (Archaeology). Therefore, the proposal provides seven well designed dwellings utilising complimentary materials that will preserve the amenity of this part of the Conservation Area and will respect the setting of a listed building to the south of the site. Given the less than substantial harm to the significance of a designated heritage asset the proposal is weighed against the public benefits as required by para 134 of the NPPF. In this case it is considered that the provision of sustainable housing together with jobs in the construction industry are material consideration in the economic dimension of the scheme.

## Transport

- 6.18 It is stated in representations received that the existing means of access is not satisfactory. However, the proposed means of access is on the outside of a bend and maximises the visibility required for traffic passing through Luston at 30 mph. The Transportation Manager has no objections to the means of access. An issue raised by the Transportation Manager in relation to on-site parking provision and secure cycle storage has been addressed in revised plans. Therefore, the revised proposal provides a safe access and necessary parking/cycling facilities, as required by the provisions of Policy MT1 of Core Strategy.

## Ecology

- 6.19 The main issue raised by the Council's Ecologist relating to the need for enhancement of bio-diversity as recommended in the appraisal supporting the proposal. Therefore, subject to further enhancement being carried out as recommended in a condition this proposal accords with Policy LD2 of Core Strategy.

## **Impact on Residential Amenity**

- 6.20 Representations have been received in relation to the perceived impact on residential amenity from residents living in the new properties overlooking existing properties to the east and south and also that there is insufficient spacing between proposed and existing dwellings and indeed between proposed dwellings. The originally submitted plans have been revised such that first floor windows that would have overlooked Brick House and Meadow View have been removed. The dwellings sited along the southern boundary do not directly look into the existing property to the south and are sited sufficient distance i.e at minimum 9.6 metres away from the southern boundary such that adverse overlooking and overbearing, as claimed in representations, will not occur to the detriment of residential amenity. The distance between the two four bedroom properties is 17.4 metres which is again acceptable, particularly given the areas of private garden areas that are provided for each. Therefore it is considered that the scheme will accord with the provisions of Policy SD1 of Core Strategy

## **Surface Water Drainage**

- 6.21 This is an issue that has protracted determination of this application however the Land Drainage Consultant is now satisfied that flood risk will not occur. Therefore, subject to conditions controlling water usage and rainwater harvesting, including the control of hardstanding now and into the future that this element of the scheme is addressed.

## **Summary and Conclusions**

- 6.22 The pursuit of sustainable development is a golden thread running through both plan-making and decision-taking and identifies three dimensions to sustainable development; the economic, social and environmental roles. This is carried on in the provisions of the Core Strategy objectives which translate into policies encouraging social progress, economic prosperity and controlling environmental quality.
- 6.23 When considering the three indivisible dimensions of sustainable development as set out in the paragraph 14 of the NPPF, officers consider that the scheme when considered as a whole is representative of sustainable development and that the presumption in favour of approval is engaged. The site is within the settlement of Luston. Also, there is not a 5 year housing land supply at the present time, it is concluded that, as Luston has been identified as a settlement for growth in Policy RA2 of Core Strategy, this proposal is not only environmentally acceptable in relation to this part of the settlement but it will also provide a modest contribution to the dwellings required given the stated shortfall in housing land supply. It is considered to be a sustainable location with very good access to a wide variety of services and facilities. This is with respect to the school 250 metres away reached by footpath and the public house on the opposite side of the B4361 road, in this respect the proposal is in broad accordance with the requirements of chapter 4 of the NPPF (Promoting sustainable travel) and choice of modes of transport.
- 6.24 The contribution the development would make in terms of jobs and associated activity in the construction sector and supporting businesses should also be acknowledged as fulfilment of the economic role of sustainability.
- 6.25 Whilst, the site is in Luston Conservation Area and adjoins a listed building, the scale and form of the proposed development will not result in the proposal having an adverse impact on the Conservation Area and adjoining listed building as confirmed by the Conservation Manager (Historic Buildings). Therefore, the proposal will lead to a less than substantial harm to the significance of a designated heritage asset and therefore accords with s66 (1) and s72 of the Planning (Listed Buildings and Conservation Areas ) Act 1990.



- 6.26 Additional traffic will join the B4361 however this road is capable of taking the increased traffic volumes without having an adverse impact on highway safety as confirmed by the Council's Transportation Manager.
- 6.27 Acceptable foul and surface water drainage can be provided. There is sufficient land available for the treatment of foul drainage and surface water drainage. The latter will require careful consideration and will be the subject of the prior approval of the planning authority.
- 6.28 Ecological issues can be addressed by submission of further details for the enhancement of biodiversity in and around the development site.
- 6.29 The residential amenity of residents living in the vicinity of the site will not be adversely impacted upon, given the orientation and siting of the dwellings to existing properties and will not result otherwise result in a development that is overbearing and detrimental to residents adjoining the site.
- 6.30 Officers conclude that there are no overriding landscape, highways, drainage, amenity and ecological issues that should lead towards refusal of the application and that any adverse impacts associated with granting planning permission are not considered to significantly and demonstrably outweigh the benefits in accordance with the provisions of the NPPF. It is therefore recommended that planning permission be granted subject to planning conditions.

## **RECOMMENDATION**

**That planning permission be granted subject to the following conditions and any other conditions recommended by officers:**

- 1. A01 Time limit for commencement (full permission)**
- 2 B02 Development in accordance with the approved plans**
- 3 C01 Samples of external materials**
- 4 F14 Removal of permitted development rights**
- 5 F16 No new windows in specified elevations**
- 6 G02 Retention of trees and hedgerows**
- 7 G10 Landscaping scheme**
- 8 G11 Landscaping scheme implementation**
- 9 The recommendations set out in the ecologist's report from Worsfield and Bowen dated September 2014 should be followed unless otherwise agreed in writing by the local planning authority. Prior to commencement of the development, a habitat protection and enhancement scheme should be submitted to and be approved in writing by the local planning authority, and the scheme shall be implemented as approved.**

**An appropriately qualified and experienced ecological clerk of works should be appointed (or consultant engaged in that capacity) to oversee the ecological mitigation work.**

**Reasons:**

To ensure that all species are protected having regard to the Wildlife and Countryside Act 1981 (as amended), the Conservation of Habitats and Species Regulations 2010 and Policy LD2 of Herefordshire Local Plan – Core Strategy

To comply with Herefordshire Council’s Policy LD2 of Herefordshire Local Plan – Core Strategy in relation to Nature Conservation and Biodiversity and to meet the requirements of the NPPF and the NERC Act 2006

- 10 H03 Visibility splays
- 11 H11 Parking – estate development (more than one house)
- 12 H21 Wheel washing
- 13 121 Scheme of surface water regulation
- 14 I16 Restriction of hours during construction
- 15 L01 Foul/surface water drainage
- 16 L02 No surface water to connect to public system
- 17 L03 No drainage run-off to public system
- 18 Prior to the first occupation of any of the residential development hereby permitted written evidence / certification demonstrating that water conservation and efficiency measures to achieve the ‘Housing – Optional Technical Standards – Water efficiency standards’ (i.e. currently a maximum of 110 litres per person per day) for water consumption as a minimum have been installed / implemented shall be submitted to the Local Planning Authority for their written approval. The development shall not be first occupied until the Local Planning Authority have confirmed in writing receipt of the aforementioned evidence and their satisfaction with the submitted documentation. Thereafter those water conservation and efficiency measures shall be maintained for the lifetime of the development;

Reason: To ensure water conservation and efficiency measures are secured, in accordance with policy SD3 (6) of the Herefordshire Local Plan Core Strategy 2011-2031

**INFORMATIVES:**

- 1. The Local Planning Authority has acted positively and proactively in determining this application by assessing the proposal against planning policy and any other material considerations, including any representations that have been received. It has subsequently determined to grant planning permission in accordance with the presumption in favour of sustainable development, as set out within the National Planning Policy Framework
- 2. The applicant needs to provide the following information in relation to Condition 13 above :

- A detailed surface water drainage design, including drainage layout drawings and demonstrating how discharges from the site are restricted to no greater than pre-developed rates.
- A detailed foul water drainage design, showing the location of the connection into the mains sewer.
- Evidence of groundwater levels a minimum of 1m below the base of any infiltration devices and/or unlined attenuation structures.
- Details of provisions to protect the site against flooding during extreme events that may overwhelm the surface water drainage system and/or a result of blockage.
- Details of any outfall structures to Luston Brook.
- Confirmation of who will be responsible for the adoption and maintenance of the surface water drainage system.

Decision: .....

Notes: .....

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**Background Papers**

Internal departmental consultation replies.

