10 DCSE2005/2343/F -REFURBISHMENT AND CONVERSION OF EXISTING DERELICT BARN TO RESTAURANT AND CREATION OF NEW CAR PARKING FACILITIES SERVING EXISTING HOTEL AND NEW RESTAURANT, TOGETHER WITH ASSOCIATED JUNCTION IMPROVEMENT WORKS, CASTLE LODGE HOTEL, WILTON, ROSS-ON-WYE, HEREFORDSHIRE, **HR9 6AD**

For: Mr. & Mrs. J. Felices per Peter Barnes Associates, Rhys House, James Street, Ebbw Vale, NP23 6JG

Date Received: 15th July 2005Ward: LlangarronGrid Ref: 58880, 24388Expiry Date: 9th September 2005Local Member:Councillor Mrs. J.A. Hyde

1. Site Description and Proposal

- 1.1 The application site comprises a substantial stone barn and adjoining land, situated in the angle between the A40 trunk road, the B4260 leading to Ross-on-Wye and the unclassified village road leading to Wilton Castle. Planning permission for conversion of the barn to a conference centre and construction of a car park was granted planning permission on 25th September, 2002 and for conversion to a restaurant and construction of a car park on 15th October, 2003.
- 1.2 The current proposal is a revised scheme for conversion to a restaurant. In this proposal there would be two additions to the building: a single-storey lean-to extension at the rear and an entrance lobby and staircase at the front. The former would be about 7.8m x 4.5m and incorporate food preparation areas and wc's; the latter would be about 4.1m wide x 2.1m deep x 5.7m maximum height. The entrance staircase would be partly curved to follow the line of the staircase, with timber cladding and partly glazed with a wooden entrance door. The roof would be copper sheeting. The ventilation slits would be re-opened and glazed and the rear wagonway would have full height glazing with hardwood external doors. Each roof slope would have two sets of paired rooflights and set within a clay tiled roof.
- 1.3 The scheme differs from that previously approved primarily in the addition of the leanto and entrance/staircase but would be distinctly different in its internal arrangement. In the new proposal all the wc's would be on the ground floor rather than just the disabled wc and the food would be prepared within the main area of the restaurant rather than a separate kitchen. The central staircase would replace the two internal staircases previously approved. The reasons for these changes are set out in paragraph 5.1 below.
- 1.4 The proposed car park would occupy the open area to the south-west of the barn. There would be spaces for 55 cars with additional planting mainly along the road leading to Wilton Castle and by the roundabout. A new vehicular access would be formed about 40m from the junction of that road with the B4260, with a 2.4m x 33m

visibility splay. The narrow village road would be widened to 5.5m for the whole of this section with a new stone boundary wall (600mm high). A pedestrian entrance and path would be formed as a link between hotel and restaurant.

2. Policies

2.1 **Planning Policy Guidance**

PPS1	Delivering Sustainable Development
PPG4	Industrial & Commercial Development & Small Firms
PPS7	Sustainable Development in Rural Areas
PPG13	Transport
PPG15	Planning and the Historic Environment
PPG16	Archaeology & Planning
PPG21	Tourism

2.2 Hereford and Worcester County Structure Plan

- Policy E6 Industrial Development in Rural Areas
- Policy E8 Industrial Development in Rural Areas
- Policy E9 Industrial Development in Rural Areas
- Policy E20 Tourism Development
- Policy CTC1 Areas of Outstanding Natural Beauty
- Policy CTC2 Development in Areas of Great Landscape Value
- Policy CTC5 Archaeology
- Policy CTC7 Landscape Features
- Policy CTC9 Development Criteria
- Policy CTC13 Conversion of Buildings
- Policy CTC14 Conversion of Buildings
- Policy CTC15 Conservation Areas
- Policy TSM1 Tourism Development
- Policy TSM3 Tourism Development

2.3 South Herefordshire District Local Plan

Policy GD1	General Development Criteria					
Policy C1	Development within Open Countryside					
Policy C2	Settlement Boundaries					
Policy C3	Criteria for Exceptional Development Outside Settlement Boundaries					
Policy C4	Areas of Outstanding Natural Beauty Landscape Protection					
Policy C5	Development within Areas of Outstanding Natural Beauty					
Policy C6	Landscape and Areas of Outstanding Natural Beauty					
Policy C7	Areas of Outstanding Natural Beauty					
Policy C8	Development within Areas of Great Landscape Value					
Policy C9	Landscape Features					
Policy C20	Protection of Historic Heritage					
Policy C22	Maintain Character of Conservation Areas					
Policy C23	New Development Affecting Conservation Areas					
Policy C30	Open Land in Settlements					
Policy C34	Preservation and Excavation of Important Archaeological Sites					
Policy C36	Re-use and Adaptation of Rural Buildings					
Policy ED3	Employment Proposals within/adjacent to Settlements					
Policy ED5	Expansion of Existing Businesses					
Policy ED6	Employment in the Countryside					
Policy ED7	Re-use and Adaptation of Rural Buildings for					
-	Employment/Tourism Use					

Policy TM1	General Tourism Provision
Policy TM3	Extensions to Hotels and Inns
Policy T1A	Environmental Sustainability and Transport
Policy T3	Highway Safety Requirements
Policy T4	Highway and Car Parking Standards

2.4 Unitary Development Plan (Revised Deposit Draft)

Policy LA1	Area of Outstanding Natural Beauty
Policy LA3	Setting of Settlements
Policy HBA6	Development within Conservation Areas
Policy HBA8	Locally Important Buildings
Policy HBA12	Re-use of Rural Buildings
Policy E10	Employment Proposals within or adjacent to Main Villages
Policy T11	Parking Provision

3. Planning History

3.1	SH910820PF	Conversion of existing barn to a dwelling	-	Approved 07.01.92
	SH951204PF	Change of use of land and barn (with extension) to vehicle hire centre with offices with valleting room.	-	Refused 05.02.96
	SH960935PF	Change of use of land and barn (with extension) to vehicle hire centre with offices with valleting room.	-	Refused 05.02.96
	SH961463PF	Conversion of existing barn to a dwelling.	-	Approved 02.06.97
	SE2002/1765/F	Change of use to redundant barn into conference centre and construction of new car park.	-	Approved 25.9.02
	SE2003/2164/F	Relocation of restaurant to barn and construction of new car park and alterations to existing car park	-	Approved 15.10.03
	SE2004/3888/F	Refurbishment and conversion of existing derelict barn to restaurant and creation of new car parking facilities serving existing hotel and new restaurant, together with associated junction improvement works	-	Withdrawn 28.02.05

4. Consultation Summary

Statutory Consultations

4.1 Highways Agency "has continued to liaise with the developer's consultants to address the safety concerns previously highlighted and I can confirm that we have now received revised plans identifying an improved mitigation package, we have also agreed and received PICADY assessments that have been based on more robust future year scenarios and these demonstrate that the junction will continue to function acceptably. In light of the above the Highways Agency's revised response under Article 14 of the Town and Country Planning (General Development Procedure) Order 1995 is one of no objections to the proposals subject to a condition requiring mitigation measures."

- 4.2 Welsh Water recommend that conditions be imposed regarding drainage of the site.
- 4.3 English Heritage do not comment in detail but "express concern that the present proposal should not result in too intensive and too visually insistent a use of the site. It would be harmful to the setting of the castle if its approach was dominated by a high volume catering operation and its associated car park. In that context we would particularly draw your attention to the visual impact of the car park layout as proposed it really should be much softer and greener if it is to be appropriate to its location. We have doubts about the projection of the stair and entrance from the main doors of the barn, but we defer to the advice of your conservation team on design matters concerning this building. Providing that the issues we have identified are addressed, we recommend that this case should be determined in accordance with government guidance, development plan policies and with the benefit of any further necessary conservation advice locally."

Internal Council Advice

4.4 Traffic Manager comments:

"Further to receiving additional traffic assessment information and viewing the proposed revisions to layout and access the Traffic Manager's comments are as follows:

There is an extant permission for a restaurant and car parking and I am of the opinion that the current application will not result in a significant increase in traffic generation over the granted permission. The proposal also includes further highway works to improve vehicle movements in Wilton Lane. In view of these points there are not grounds for refusal on highway issues."

4.5 Conservation Manager observes:

"The rear lean-to is handled in a traditional lean-to, a not uncommon feature on barns. The front extension is quite modern and contemporary in its approach. This is a 'honest' architectural approach, i.e. not pretending that it is contemporary with the main barn itself. Some wall fabric is removed between dining/male wc/lobby. As intimated previously, the former scheme achieved the conversion within the volume of the existing barn and satisfied requirements of the Council's Supplementary Planning Guidance (SPG). It has been pointed out to the applicant and his architect that this latest scheme conflicts with the Council's SPG in this regard (see paragraph 4.1 iv).

Additionally, I am concerned regarding the condition of this fabric in as much as I have previously mentioned its deterioration. I note that no measures have been put in place to prevent further deterioration and a structural engineer's report has not been submitted, as far as I am aware. I further appreciate that you will wish to consider the applicant's statement where he sets out his reasons for the proposals and 'need' for this latest submission

With regard to the layout and landscaping, this is an inferior, less attractive scheme than that approved (drawing no. 483:04 as part of SE2003/2164/F). The car park layout should be re-designed to match the layout originally submitted and approved in order to provide acceptable landscaping.

An archaeologically sensitive location and a site investigation will be necessary."

- 4.6 Head of Community and Economic Development has no objection to the proposal.
- 4.7 Head of Environmental Health recommends a condition regarding a ventilation scheme.

5. Representations

- 5.1 The applicant's agent has submitted a detailed justification of the changes from the approved scheme and an accompanying Design Statement. These are in summary:
 - 1. The approved application does not conform to the requirements of the Disability Discrimination Act 1995 or the Buildings Regulations Part M.
 - 2. To correct this the dining spaces would be reduced to about 29 on ground floor and 10 on first floor and would not overcome inherent defects in layout (e.g. toilets on first floor and poor functional relationships).
 - Most diners prefer to eat at a ground floor table and are reluctant to use first floor

 majority of business would therefore be based on available 29 ground floor
 seats but this would not prove to be viable.
 - 4. An extension for toilets only and improved layout would provide 18 ground floor seats and 24 on first floor, which again is not a feasible number for a commercial operation.
 - 5. Proposed scheme would provide about 36 ground floor seats, 24 first floor seats, a total of about 60 which is commercially viable and meets Disability Discrimination Act and Part M requirements.
 - 6. Dining/circulation is 113m² compared to 111.5m² of approved scheme, i.e. no effective change.
 - 7. The Council's policies are to retain agricultural structures and where practicable return to commercial use. Commercial viability should be given full sympathetic consideration, especially in relation to Disability Discrimination Act and Part M of Building Regulations.
 - 8. Principal entrance would create a more significant focal point with a fully automatic solid door set in a glazed screen with no visible transoms or mullions, semi-circular stairs and back lighting from full height glazing.
 - 9. A traffic assessment study has been submitted and discussed with the Highways Agency its conclusion is that little or no impact on vehicular movements compared to current levels or resulting from previous approval.
- 5.2 The Parish Council observes:
 - 1. No objections to plans concerning the refurbishment of the derelict barn or creation of new car parking facilities.
 - 2. The Parish Council is not satisfied with the proposals to improve the junction at the Wilton roundabout and has grave concerns regarding road safety issues should this development proceed.

- 5.3 Twenty-three letters have been received objecting to the proposal. In summary the reasons cited are as follows:
 - 1. inappropriate and out of scale commercialisation of small scale residential area in Conservation Area and Area of Outstanding Natural Beauty such areas need protecting but would be seriously harmed by this development
 - 2. car park would occupy whole field thereby detracting visually from the area and causing light pollution planting and hedges which gave some screening have already been removed
 - 3. there would inevitably be more traffic at an extremely busy and dangerous set of junctions
 - 4. It is common knowledge that hotel and barn being marketed on basis of attracting more traffic off the trunk road and investment required needs very significant increase in customers to be worthwhile a fast food outlet for the trunk road is planned, open 7am to 11pm (and all night?)
 - 5. proposal is self-standing business, no longer ancillary to hotel unlike conference centre this would be permission for a new use gained by stealth
 - consequently volume of traffic on very busy junctions are certain to rise traffic impact study is flawed: increase would be from 50 to 72 seats (44%) not just 4 seats; no allowance for external seating or bar customers; could become high turnover outlet (e.g. Harvester, Toby Inn); no up to date data on traffic movements
 - 7. roundabout already at capacity and any increase will inevitably lead to fatalities; compounded by petrol filling station/fast food outlet on opposite side of B4620 with difficult access onto roundabout
 - 8. this would result in unacceptable number of traffic movements in residential area to detriment of local amenity; local people are campaigning to make area safer and general problems should be addressed before further traffic along lane are countenanced
 - 9. widening lane will worsen matters, with increased speeds and car park entrance nearer to roundabout with disastrous consequences (there are 4 domestic garages near proposed entrance with cars reversing into lane
 - 10. nine years ago when considerably less traffic, permission for vehicle hire, which would have generated far fewer vehicles, was refused
 - 11. conversion scheme completely out of keeping with barn and its historic setting near castle and conflicts with policies to discourage extensions changes so extensive existing barn would disappear
 - 12. to allow exception would lead to irresistable pressure for further extension here and elsewhere; precedent would have been set
 - 13. proposal conflicts with Council Policy GD.1
 - 14. negative impression would be created at entrance/gateway to Ross-on-Wye
 - 15. successive applications since 2002 and each time commercial potential of site main aim with no regard to amenities and safety of local area
 - 16. conditions to control noise, lighting, overnight parking, hours of opening and keep hotel and restaurant linked are suggested but it is not considered that condition would effectively control volume of traffic or protect local amenity
 - 17. objector considers that it is significant that the Traffic Manager, Landscape Officer, English Heritage, and CPRE all object to the proposal
 - 18. in summary only justification is that proposal is for conversion of a barn but this is at cost of barn's original character, loss of its setting, increase traffic at very busy junction and serious harm to local residents' amenities.

- 5.4 8 additional letters of objection have been received responding to the amended layout and highway works. Previous concerns are re-iterated and in summary the following comments:
 - 1. local residents have been totally ignored and concerns not taken seriously very little consideration given to mitigation of such a large intrusive development
 - 2. site can never be made safe for proposed increase in traffic such a business will need more seats, more traffic, more danger
 - survey relates to traffic generated by approved scheme not this application this should be looked at again; numerous questions regarding traffic implications remain outstanding
 - 4. realignment of verge off 'B' road would speed traffic turning into lane from roundabout but increase danger for vehicles turning right into lane
 - 5. Regional Manager of Highways Agency is quoted: "I cannot understand why the planning officer has not refused this application and share your concerns regarding road safety ... I believe this warrants a full enquiry."
 - 6. 134 signature petition was submitted in respect of previous application and no material change other than seating capacity would increase from 50 to 74 or 90 as stated by applicant in press petition should be taken into account
 - 7. recent meetings between Highways, Paul Keetch and local residents, and agreed that major problems surrounding Wilton roundabout but how would proposed lane widening make junction safer and how can decision be made without taking rest of junction into consideration?
 - 8. has applicant right to improve what is Parish land?
 - 9. footway from car park to B4260 will result in car park without any control
- 5.5 The Access for All Committee note with approval the provision of disabled parking spaces and disabled wc's.

The full text of these letters can be inspected at Southern Planning Services, Blueschool House, Blueschool Street, Hereford and prior to the Sub-Committee meeting.

6. Officers Appraisal

- 6.1 The barn is a traditional rural building with stone walls and pantiled roof. Although very close to the A40 trunk road it is of local significance and contributes to the character of the area. It is included within Wilton Conservation Area but is just outside the defined limits of the settlement. The barn has deteriorated structurally over the past year or so, with a partial collapse of the roof structure and attention is required soon if the building is to have a long term future. This is only likely if a viable use can be found. Planning permission has been given on two occasions for residential conversion but despite marketing has not been developed for this purpose, presumably because of proximity to the A40(T). A commercial use is therefore the only realistic use in prospect and the principle has been accepted by earlier planning permissions for use as conference centre or restaurant.
- 6.2 Nevertheless the application property is close to a residential area and vehicular access is along a lane also used by local residents. Furthermore the lane joins the B4260 close to the junction of the road with the A40(T) and A49(T) at Wilton roundabout. The key issues therefore are whether the proposed development would be compatible with the need to ensure highway safety, the amenities of local residents and the character of Wilton Conservation Area.

- 6.3 The highway issues have been carefully considered by both the Highways Agency and the Traffic Manager. With respect to flows along the trunk road network the Highways Agency is satisfied that the additional traffic flows at the roundabout would not have a significant effect on congestion and consequently would not prejudice highway safety. The junction of the lane leading to the hotel and barn with the B4260 is about 50m from Wilton roundabout and opposite the entrance to Wilton Garage (petrol filling station with café). Traffic movements at this junction are potentially hazardous especially turning right towards the roundabout with traffic leaving the roundabout towards Ross or seeking to enter/exit Wilton Garage. Nevertheless improvements to the lane are proposed and could be required by planning condition. These would improve the junction with the B4260 and widen the minor road for the short section (about 40m) that would be used by most hotel/restaurant users. In the Traffic Manager's opinion these benefits would off-set the increase in traffic compared to the smaller restaurant for which planning permission has already been granted.
- 6.4 A major concern of objectors, stated in many of the letters, is that the barn will become a fast food outlet rather than an adjunct to the Castle Lodge Hotel. The marketing of the hotel seems to objectors to contradict the stated intention of the applicants that the proposal is to provide better restaurant facilities for the hotel not a free-standing restaurant. The ownership of the hotel/restaurant is not a relevant planning consideration. Nevertheless in view of traffic concerns both Highways Agency (in relation to the earlier application) and the Traffic Manager recommended that conditions linking hotel and restaurant and prohibiting a take-away service be imposed. It is accepted that a restaurant catering for motorists could attract more custom than the present hotel restaurant proposal. It would not be unreasonable therefore to limit the number of seats to 60 (i.e. an increase of about 20% over the previous intention) and to limit hours when meals can be served.
- 6.5 With regard to resident's amenities the main concern is traffic noise. Several houses are close to the lane and some increase in noise from vehicles entering and leaving the car park and manoeuvring within it can be expected. Nevertheless given the high ambient noise levels the increase over the approved scheme is not considered to be so serious as to justify refusal of planning permission. There is scope for ample planting to mitigate the otherwise harsh appearance of a large car park and external lighting can be controlled by planning condition.
- 6.6 The Council's policies do not encourage extensions to barns to facilitate conversion. The approved restaurant did not include extensions but, on the evidence submitted by the applicant's agent (see paragraph 5.1) that scheme needs to be modified to comply with statutory requirements and this may well limit its commercial viability as a restaurant. In these circumstances and bearing in mind the physical condition of the building I consider that in principle minor extensions to facilitate development can be accepted. However reservations have been raised by English Heritage and the Head of Conservation as well as local residents regarding the design and external appearance of the entrance/staircase extension. The Head of Conservation advises that the design problems could be overcome and the applicant has agreed to reconsider this aspect of the proposal. Similarly the proposed landscaping of the car park is not acceptable but with careful consideration this may be remedied. The earlier scheme did include a satisfactory landscaping scheme and the principle of a car park in this location has been accepted. It is concluded therefore that provided acceptable amendments are made the proposal should not harm the character and appearance of Wilton Conservation Area.

RECOMMENDATION

That subject to submission of acceptable revised drawings of the entrance/staircase extension and car park layout and landscaping the officers named in the Scheme of Delegation to Officers be authorised to issue planning permission subject to the following conditions and any additional conditions considered necessary by officers:

1. A01 (Time limit for commencement (full permission))

Reason: Required to be imposed by Section 91 of the Town and Country Planning Act 1990.

2. A06 (Development in accordance with approved plans)

Reason: To ensure adherence to the approved plans in the interests of a satisfactory form of development.

3. B01 (Samples of external materials)

Reason: To ensure that the materials harmonise with the surroundings.

4. C04 (Details of window sections, eaves, verges and barge boards)

Reason: To safeguard the character and appearance of this building of [special] architectural or historical interest.

5. C05 (Details of external joinery finishes)

Reason: To safeguard the character and appearance of this building of [special] architectural or historical interest.

6. No external flues or extraction equipment shall be installed at the premises without the prior written approval of the local planning authority.

Reason: In the interests of the amenity of the area.

7. C09 (External repointing)

Reason: To safeguard the character and appearance of this building of [special] architectural or historical interest.

8. C10 (Details of rooflights)

Reason: To ensure the rooflights do not break the plane of the roof slope in the interests of safeguarding the character and appearance of this building of [special] architectural or historical interest.

9. C11 (Specification of guttering and downpipes)

Reason: To safeguard the character and appearance of this building of [special] architectural or historical interest.

10. C18 (Details of roofing)

Reason: To safeguard the character and appearance of this building of [special] architectural or historical interest.

11. D01 (Site investigation - archaeology)

Reason: To ensure the archaeological interest of the site is recorded.

12. The use hereby permitted shall only be open to customers between 8am and 11pm daily and shall only serve meals between 8am and 9.30am, 12 noon and 2pm, and 6pm and 11pm daily.

Reason: In the interests of the amenities of existing residential property in the locality.

13. The restaurant hereby approved shall only be used for purposes ancillary to the hotel known as Castle Lodge Hotel and within Class C1 of the Town and Country Planning (Use Classes) Order 1987 (or any order revoking and re-enacting that order with or without amendment) and shall not be used as a separate restaurant or for any other purpose within Class A3 of that Order.

Reason: To define the terms of the permission and in the interests of safe and free flow of traffic on the highway and the amenities of neighbours.

14. No take-away service shall be carried out from the restaurant hereby approved.

Reason: To define the terms of the permission and in the interests of safe and free flow of traffic on the highway and the amenities of neighbours.

15. The restaurant and car park hereby permitted and the Castle Lodge Hotel shall not be sold, let or leased separately from each other, and the car parking shall be permanently available for use by both the restaurant and the Castle Lodge Hotel.

Reason: To ensure that car parking facilities are readily available for both premises and to protect the amenities of neighbouring dwellings.

16. F18 (Scheme of foul drainage disposal)

Reason: In order to ensure that satisfactory drainage arrangements are provided.

17. F22 (No surface water to public sewer)

Reason: To safeguard the public sewerage system and reduce the risk of surcharge flooding.

18. F32 (Details of floodlighting/external lighting)

Reason: To safeguard local amenities.

19. F40 (No burning of material/substances)

Reason: To safeguard residential amenity and prevent pollution.

20. G13 (Landscape design proposals)

Reason: In the interests of visual amenity.

21. G05 (Implementation of landscaping scheme (general))

Reason: In order to protect the visual amenities of the area.

22. G15 (Landscaping implementation)

Reason: To ensure the site is satisfactorily landscaped.

23. G17 (Protection of trees in a Conservation Area)

Reason: To ensure the proper care and maintenance of the trees.

24. G37 (Access for disabled people)

Reason: In order to ensure that the development is fully accessible.

25. G40 (Barn Conversion - owl box)

Reason: In order not to disturb or deter the nesting or roosting of barn owls which are a species protected by the Wildlife and Countryside Act 1981.

26. No development shall commence upon the application site unless or until the mitigation measures as shown on drawing number 1427.03B have been completed to the satisfaction of the local planning authority after consultation with the Highways Agency.

Reason: In the interests of highway safety and as directed by the Highways Agency.

27. H03 (Visibility splays)

Reason: In the interests of highway safety.

28. H05 (Access gates)

Reason: In the interests of highway safety.

29. H13 (Access, turning area and parking)

Reason: In the interests of highway safety and to ensure the free flow of traffic using the adjoining highway.

30. H21 (Wheel washing)

Reason: To ensure that the wheels of vehicles are cleaned before leaving the site in the interests of highway safety.

31. H27 (Parking for site operatives)

Reason: To prevent indiscriminate parking in the interests of highway safety.

32. H29 (Secure cycle parking provision)

Reason: To ensure that there is adequate provision for secure cycle accommodation within the application site, encouraging alternative modes of transport in accordance with both local and national planning policy.

- 33. The car park hereby approved shall not be used for the overnight parking of commercial vehicles, caravans or mobile homes at any time.
- 34. F37 (Scheme of odour and fume control)

Reason: In order to ensure that fumes and odours are properly discharged and in the interests of the amenities of residential property in the locality.

Informative(s):

- 1. NC01 Alterations to submitted/approved plans
- 2. NC02 Warning against demolition
- 3. ND03 Contact Address
- 4. HN01 Mud on highway
- 5. HN04 Private apparatus within highway
- 6. HN05 Works within the highway
- 7. HN07 Section 278 Agreement
- 8. HN10 No drainage to discharge to highway
- 9. HN13 Protection of visibility splays on private land
- 10. HN17 Design of street lighting for Section 278
- 11. HN22 Works adjoining highway
- 12. N15 Reason(s) for the Grant of Planning Permission

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Background Papers

Internal departmental consultation replies.

