

# PLANNING COMMITTEE REPORT

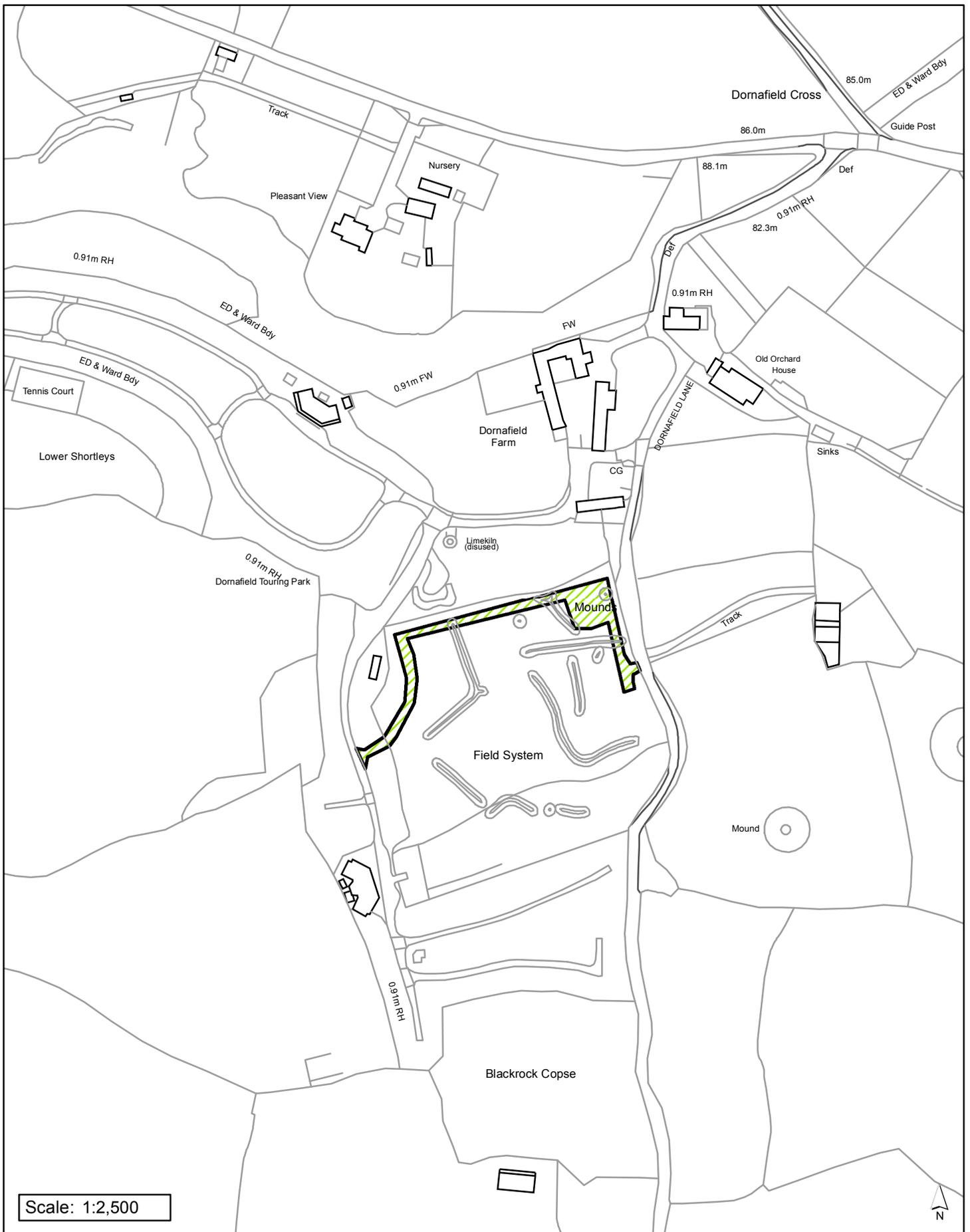
## 23 June 2020

CHAIRMAN: Cllr Mike Haines



<b>APPLICATION FOR CONSIDERATION:</b>	<b>IPPLEPEN - 19/01854/FUL - Dornafeld Farm, Dornafeld Lane - Agricultural storage building and new trackway and access</b>	
<b>APPLICANT:</b>	<b>Mr S Dewhirst</b>	
<b>CASE OFFICER</b>	<b>Gary Crawford</b>	
<b>WARD MEMBERS:</b>	<b>Cllr Alastair Dewhirst</b>	<b>Ipplepen</b>
<b>VIEW PLANNING FILE:</b>	<a href="https://www.teignbridge.gov.uk/planning/forms/planning-application-details/?Type=Application&amp;Refval=19/01854/FUL&amp;MN">https://www.teignbridge.gov.uk/planning/forms/planning-application-details/?Type=Application&amp;Refval=19/01854/FUL&amp;MN</a>	





**19/01854/FUL - Dornafield Farm, Dornafield Lane,  
Ipplepen, Devon, TQ12 6DD**

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## 1. REASON FOR REPORT

Councillor Dewhirst is a partner and director of Dornafield camping partnership, and is related to the applicant.

## 2. RECOMMENDATION

PERMISSION BE REFUSED for the following reasons:

1. The proposed building, by reason of its siting, scale and design, would have an adverse effect on the landscape character of the area and the historic setting of the Grade II\* listed Dornafield Farm. As such, the proposal would be contrary to Policies EN2A, EN5 and S22 of the Teignbridge Local Plan 2013-2033, the NPPF and section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

## 3. DESCRIPTION

### Site description

- 3.1 Dornafield Farm is a Grade II\* listed building dating from the late 15th century. It is a particularly important building of more than special interest and national historic significance as Grade II\* listing applies to only 5.5% of all listed buildings. The setting of this listed building includes the surrounding farm buildings, which are separately Grade II listed, the walled garden to the west, the grassed area known as The Orchard beyond the walled garden, and the wooded valley setting within which the farmstead nestles.
- 3.2 The field where the proposed building would be sited is located to the south of the farmhouse and the Devon Historic Environment Records note that that a geophysical survey of this field identified a number of anomalies which may represent historical ridge and furrow cultivation and parallel trends of ground disturbance. Furthermore, a Scheduled Monument known as Four barrows are situated in the field to the east of the application site on the opposite side of Dornafield Lane.
- 3.3 There are elevated views from and to the site to the scheduled monuments, across the green space of The Orchard towards the listed structures, which gives a particularly good understanding of the inter-relationship of various parts of the site, in particular the peaceful and secluded character of the immediate and wider setting.
- 3.4 The application site is located within the Denbury Down Landscape Character Area as identified in the Teignbridge District Landscape Character Assessment 2009. The wider landscape is undulating, with the immediate site benefiting from surrounding views due to the prominent nature of the site. The subject field is bounded by well-established planting and timber stock fencing with trees within the site and access being taken from Dornafield Lane.

### The proposal

- 3.5 The application seeks permission for the erection of a storage building in the north east corner of the field to the south of Dornafield farmhouse. The proposal also

includes the formation of a new track which would extend from an existing access on the eastern side of the field from Dornafeld Lane up to the new building and across the to a new access to be created to the west of the site which leads to existing caravan pitches. The original description of development referred to the proposed building as an 'agricultural storage building'. However, following an officer site visit, officers are of the opinion that the use of the site is tourism and not agriculture. As such, it was considered that the original description of development did not accurately describe the proposal and officers have amended the description of development accordingly.

### Planning history

- 3.6 There are a number of previous applications relating to Dornafeld Farm but the most relevant are:
- 89/00253/COU: Extension to form enclosed swimming pool change of use and conversion of existing building into shop, store change of use and conversion of existing buildings into 4 holiday cottages. Erection of 7 pine log holiday units and change of use of OS Nos 8508 9401 and 9309 to touring caravan camping use at land adjacent to. Approved 17/1/1990.
  - 17/01894/PE: Storage building and widening of access. Response sent 30/4/2018 advising that there was in principle support for the proposed building, track and widening of the access. However, due to concerns regarding the impact of the building upon the landscape and the setting of the nearby listed buildings, it was recommended that an alternative site be sought for the proposed building.
  - 18/02039/FUL: Agricultural storage building and new trackway and access. Withdrawn 4/7/2019.

### Building

- 3.7 The proposed building would measure 18.8 metres in length, 13 metres in width, 5.1 metres to the eaves and 6.4 metres in height. The building would be finished with steel cladding polycarbonate roofing over steel cladding and blockwork elevations and steel door. The building would feature a dual pitched roof with photovoltaic roof panels on the south roof elevation and non-opening roof lights on the north roof elevation, although the submitted 3D image shows the roof lights opened. The submitted Planning Statement details that the proposed building is intended to store refuse and recyclable materials from the caravan park, and, plant and machinery in association with the caravan and camping park and maintenance of the site.

### Track/Access

- 3.8 The proposed new track would extend from an existing access on the eastern side of the field from Dornafeld Lane up to the new building in the north east corner of the field and across the to a new access to be created to the west of the site which leads to existing caravan pitches. The new track would be finished with a crushed stone surface. The new access leads to the existing caravan site, which would suggest that the layout of the caravans would need to be addressed. No access details have been submitted to suggest how this is to be finished, however this

does not form a reason for refusal as it is not considered to be a key element of the proposal.

### Principle of the development

- 3.9 The application site is located within the open countryside and outside of any defined settlement limit as depicted in the Teignbridge Local Plan 2013-2033. Policies S1A, S1, S22 and EC3 of the Local Plan are permissive of agricultural buildings outside any settlement boundary, subject to policy criteria being met. Whilst there may be in principle support for agricultural use within the open countryside and it is acknowledged that the submitted Planning Statement notes that the proposed building would also be used to store plant and machinery for the associated agricultural maintenance of the site which included notable tracts of woodland, as detailed earlier in this report, officers consider that the predominant use of the site is tourism and not agriculture and the description of development was amended accordingly.

As such, it is considered that the building is intended to be used in connection with the existing established tourist use, for the storage of waste and, for the storage of plant and machinery in association with the caravan and camping park and for the associated agricultural maintenance of the site.

- 3.10 Notwithstanding whether there is an agricultural use taking place on the site or not, Policy S22 supports development and investment within the open countryside, where it will be managed to provide “*attractive, accessible and biodiverse landscapes*”. Policy S22 notes that one of the uses that it does support in the open countryside is tourism. However, Policy S22 details further that in assessing development proposals, particular account will be taken of “*the distinctive characteristics and qualities of the Landscape Character Area*”.

- 3.11 Policy EC11 permits tourist development outside settlement limits where at least one of seven criteria are satisfied.

- a) Expand or improve existing tourist accommodation locations;
- b) Support expansion or improvement of an existing tourist attraction;
- c) Provide a new campsite or caravan site;
- d) Involve the appropriate conversion or change of use of a permanent and soundly constructed building which sensitively retain any historic interest and character;
- e) Part of a farm diversification scheme;
- f) Use a dwelling to provide bed and breakfast accommodation; or
- g) Provide innovative or unusual forms of accommodation which widen and enhance the tourist offer of the area.

- 3.12 As such, Policies S22 and EC11 would suggest there could be support for tourist development. However, the proposed building in its current position, scale and design does not protect or enhance the landscape of the area, and therefore it is considered that the proposal cannot satisfy Policy S22.

### Conclusion

- 3.13 In summation, there is in principle support for tourist use, however, Policy S22 also advises that development cannot be supported where there is harm to the wider landscape. There was a pre-application discussion regarding this proposal in 2018 which raised concerns regarding the impact of the proposed building upon the

landscape and heritage assets. Overall, the proposal is not considered to comply with the relevant policies.

#### Design and impact upon the character and visual amenity of the area

- 3.14 In assessing the design of the proposal, the existing landscape character and materials should be taken into consideration to ensure that the proposal harmonises with that of the existing locale.
- 3.15 Policy EN2A of the Local Plan states that “to protect and enhance the area’s landscape and seascape, development will be sympathetic to and help to conserve and enhance the natural and cultural landscape and seascape character of Teignbridge”. Policy EN2A details further that development proposals should:
- a) conserve and enhance the qualities, character and distinctiveness of the locality;
  - b) where appropriate restore positive landscape and seascape character and quality;
  - c) protect specific landscape and seascape, wildlife and historic features which contribute to local character and quality; and
  - d) maintain landscape and seascape quality and minimise adverse visual impacts through high quality building and landscape and seascape design.
- 3.16 Policy EN5 of the Local Plan specifies that “to protect and enhance the area’s heritage, consideration of development proposals will take account of the significance, character, setting and local distinctiveness of any affected heritage asset, including Scheduled Monuments and Listed Buildings”. Policy EN5 notes further that “development should respect and draw inspiration from the local historic environment responding positively to the character and distinctiveness of the area, important historic features, their settings and street patterns”.
- 3.17 In coming to this decision the council must be mindful of the duty as set out in section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving the listed building, its setting and features of special architectural or historic interest which it possesses, and have given it considerable importance and weight in the planning balance.
- 3.18 The site also lies within the Denbury Down Landscape Character Area, a sensitive landscape recognised by Teignbridge as a landscape with many cultural attributes. The Strategic Guidelines of the Denbury Down Landscape Character Area details six recommendations with regards to settlement and development in this landscape character area which include:
- *“Ensure the sensitive location of new development, avoiding prominent hilltops and slopes”, and*
  - *“Conserve the settlement pattern of scattered farms and hamlets and nucleated villages and ensure that new development reflects vernacular character”.*
- 3.19 The proposed development is in a relatively elevated position and there is the possibility that the building will be glimpsed from the Totnes Road, however, the land rises behind the site and woodland immediately to the north of the development is likely to partially mask/ameliorate it. More locally however, the site lies within an area of narrow lanes and historic farmsteads which have a great

feeling of time depth and a strong vernacular character. These characteristics are particularly pronounced around the site where the development will be experienced within the context of the scheduled monument and the approach to Dornafeld Farm, a Grade II\* listed building.

- 3.20 The character of the proposed building is defined by its appearance but also its use. The proposed building is of a type that is used for both agriculture and industry. Whilst the submitted Planning Statement details that the proposed building would be used to store plant and machinery for the associated agricultural maintenance of the site, the building would be substantially used for the storage of refuse and recyclable materials from the caravan park, and, plant and machinery in association with the caravan and camping park.
- 3.21 It is considered that the introduction of a large, modern, building and its associated infrastructure in a prominent, elevated position would have an adverse effect on the landscape character of the area and the proposal would erode, rather than conserve the character and distinctiveness of the locality. As such, it is deemed that the proposed development would be contrary to Policy EN2A.
- 3.22 It is acknowledged that the Council's Conservation Officer has not objected to the proposal and she has commented in her consultation response that whilst the setting of the high-grade listed building is wide, the topography, distance and intervening wooded area means that there will be no experience of the listed building from the site and no intervisibility between them. However, the National Planning Policy Framework defines the setting of a heritage asset as: "The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve". In this case the proposed building would be of a significant size and would be sited adjacent to, and on elevated land from, Dornafeld Lane which forms an important approach to Dornafeld Farm when travelling north from the village of Ipplepen. It is therefore considered that the proposal would erode the historic vernacular setting of the Grade II\* listed building. As such, it is deemed that the proposal would fail to protect and enhance the area's heritage, contrary to Policy EN5.
- 3.23 Paragraph 193 of the NPPF details that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
- 3.24 Paragraph 196 of the NPPF specifies that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
- 3.25 Whilst it is considered that the proposal would lead to less than substantial harm to the significance of the designated heritage assets, it is considered that the proposal would have limited public benefits in the form of locating the storage area for refuse and recyclable materials further away from holiday makers in order to reduce noise and disturbance impacts. As such, it is deemed that the public benefits fail to outweigh the harm which has been identified in relation to the setting of the Grade II\* listed building.

### Archaeology

- 3.26 Following the submission of a Written Scheme of Investigation (WSI) during the course of this application, Devon County Council's Archaeology department have confirmed that the submitted information is acceptable. As such, it is deemed that the proposal would not result in any adverse impacts upon archaeological interests.

### Highways impacts

- 3.27 Devon County Council's Highways department have raised no objections to the proposal. The new storage building would be accessed from Dornafeld Lane by an existing field access and whilst the proposal may result in an increase in the number of vehicles using this access, there is sufficient space for vehicles to turn on the site so that they can enter and exit the public highway in a forward gear. As such, it is deemed that the proposal would not result in any significantly worse highways impacts than the existing situation.

### Carbon reduction

- 3.28 Policy S7 (Carbon Emission Targets) of the Local Plan states that the council will work proactively with partners and through public and private investment and the management of development, will seek to achieve reductions in carbon emissions per person arising within Teignbridge of about 48% from 2017 levels by 2050. Policy EN3 (Carbon Reduction Plans) of the Local Plan details that development proposals should seek to minimise their carbon footprint both during construction and in use, to achieve the carbon emissions target in Policy S7.
- 3.30 The proposal involves the erection of a building for the storage of refuse and recyclable materials from the caravan park, albeit this storage is already provided elsewhere on the site. Furthermore, the proposed building would feature photovoltaic roof panels on the south roof elevation.

### Other matters

- 3.31 Whilst the site is located within a mineral safeguarding area, both Devon County Council's Minerals department and the Devon Stone Federation have raised no objections to the proposed development.

### Conclusion

- 3.32 In conclusion, it is considered that the proposed development would have a detrimental impact upon the immediate and wider historic landscape character of the area.
- 3.33 The proposal would have certain benefits, chiefly in resulting in an incremental addition to the everyday running of the caravan site, supporting employment during construction, by generating trade for local waste services and facilities, and the installation of photovoltaic panels on the roof of the building. However, the benefits of the building would inevitably be modest and could likely be achieved through delivering the same facility in a less sensitive location on site.

3.34 For the above reasons, having considered the development plan as a whole, the approach in the NPPF, and all other relevant considerations, it is concluded that the application should be refused.

#### **4. POLICY DOCUMENTS**

##### Teignbridge Local Plan 2013-2033

S1A (Presumption in favour of Sustainable Development)

S1 (Sustainable Development Criteria)

S2 (Quality Development)

S7 (Carbon Emission Targets)

S22 (Countryside)

EC3 (Rural Employment)

EC11 (Tourist Accommodation)

EN2A (Landscape Protection and Enhancement)

EN3 (Carbon Reduction Plans)

EN5 (Heritage Assets)

Listed Buildings and Conservation Areas Act 1990

Subsection (I) are the planning Acts and Part I of the Historic Buildings and Ancient Monuments Act 1953

National Planning Policy Framework

National Planning Policy Guidance

Denbury Down Landscape Character Area, Teignbridge District Landscape Character Assessment 2009

#### **5. CONSULTEES**

##### **TDC Landscape Officer:**

##### **SUMMARY**

The scale and character of the proposed development would erode the historic landscape character of the scheduled monument and the historic vernacular setting of a 2\* listed building. In doing so, the proposals would not comply with policies EN2a Landscape and EN5 Historic Environment and, as a consequence, there is a landscape / historic landscape objection.

Mitigation through hedge planting / management is possible to minimise the harm however the harm to the character of the scheduled monument would persist.

Should the officer be minded to approve the scheme, the requirements of the following should be conditioned:

- Planting proposals / landscape and ecological management plan to ensure that the roadside hedge is managed to become a tall, evergreen hedge that screens the building as effectively as possible.
- Method statement to ensure that works to construct the building and trackways minimise harm to the character of the field.
- The building to be grey, rather than green in colour; with dark-grey cladding and a mid-grey roof, to help minimise the visual presence of the structure.
- Outdoor lighting is conditioned to protect the relative dark night skies of the area.

## PROPOSALS AND CONTEXT

The proposed development is for a new, steel frame, concrete block and profile sheet clad building to act as a recycling store and vehicle store to support the working of the Dornafeld Farm caravan site. The proposals site is in a corner of a field located in a position close to the lane on the approach to the caravan site from the Totnes Road. Access to the building is proposed via an existing agricultural gateway and, at the rear via a proposed new track linking the barn with the campsite.

The field in which the proposals site lies is a scheduled monument, identified in the Devon HER as: *a number of anomalies, ground disturbance, ridge and furrow cultivation*. In the Devon Historic landscape characterisation as: *rough, undulating, ground that contains prehistoric remains*. From a landscape perspective the character of the field with its: undulating surface; exposed stone; unknowns; and possibly prehistoric features, contributes the perception of the area as being special: having great time depth, mystery and high cultural and aesthetic value.

**[Officer Note: The SM is across the lane from the application site. This is not considered to change the substance of the Landscape Officer's advice]**

## POLICY AND LANDSCAPE CHARACTER ASSESSMENT (LCA) EVIDENCE

- Policy EN2A sets out that development should conserve and enhance the qualities, character and distinctiveness of the locality.
- Policy EN5 Heritage Assets
  - *“..consideration of development proposals will take account of the significance, character, setting and local distinctiveness of any affected heritage asset, including scheduled monuments..” and*
  - *“Development should respect and draw inspiration from the local historic environment...”*
- LCA

The site lies within the Denbury Down landscape character area, a sensitive landscape, recognised in the Teignbdride LCA, as a landscape with many cultural attributes and for which there are strategic guidelines, to:

  - *“ensure the sensitive location of new development, avoiding prominent hilltops and slopes”; and*
  - *“conserve the settlement pattern of scattered farms and hamlets and nucleated villages and ensure that new development reflects vernacular character”.*

## LANDSCAPE ASSESSMENT

The proposed development is in a relatively elevated position and there is the possibility that the building will be glimpsed from the Totnes Road, however the land rises behind the site and woodland immediately to the north of the development will partially mask / ameliorate it. There is some concern that possible outdoor lighting could erode the relatively dark skies of the Denbury Down landscape character area, away from the Totnes Road.

More locally however, the site lies within an area of narrow lanes, historic farmsteads, great feeling of time depth and strong vernacular character. These characteristics are particularly pronounced around the site where the development will be experienced within the context of the scheduled monument and the approach to Dornafeld Farm, a grade 2\* listed building.

The character of the proposed building is defined by its appearance but also its use. It is a building type that is used for both agriculture and industry, however in this context the building is not to support agriculture.

It is my opinion that the introduction of a large, modern, building and its associate infrastructure would have an adverse effect on the landscape character of the area and that it would erode, rather than “*conserve the character and distinctiveness of the locality*”, and in not being sympathetic to the character of the area, contravene policy EN2A Landscape Protection and Enhancement. It would also fail to take account of heritage assets and so contravene policy EN5.

The harm would be lessened if the building was of a scale and appearance that better reflected a modern interpretation of the vernacular or it was for agricultural use.

The scale of impact could be partially mitigated by allowing the roadside hedge to grow taller and for holly to be planted in the hedge, however, it would take some time before the holly was tall enough to adequately screen the development and care and effort would be required to make sure that the base of the hedge did not become gappy. Screening the development from the lane would help, however the adverse effect on the character of the historic field would persist.

Attempts to mitigate the development through mounding or tree planting would further harm the historic landscape context and should be avoided.

### Conclusion

I conclude that, the character of the proposed development would erode the historic landscape character of the scheduled monument and the historic, vernacular setting of a 2\* listed building. In doing so, the proposals do not comply with policies EN2a and EN5 and, as a consequence, there is a landscape objection. Mitigation is possible to minimise the harm however the harm to the character of the schedule monument would persist.

However, should the planning officer be minded to approve the development, I would request that conditions requiring:

- Landscape proposals / landscape and ecological management plan to ensure that the roadside hedge screens the building as effectively as possible.
- Method statement to ensure that works to construct the building and trackways minimises harm to the character of the field.
- That the building is grey, rather than green in colour; with dark-grey cladding and a mid-grey roof.
- Outdoor lighting is conditioned to protect the relative dark night skies of the Denbury Down Landscape Character Area.

### **TDC Conservation Officer:**

The provision of a modern agricultural barn in this location will have a direct impact on archaeology and this is covered through DCC archaeological consultation. Whilst the setting of the high-grade listed building is wide, the topography, distance and intervening wooded area means that there will be no experience of the LB from the site and no intervisibility between them. There is therefore no potential for impact on the setting of listed buildings, however given the historic nature of the landscape and the archaeology within the field, the design is very poor, with no consideration given to using materials that will help blend the structure into the background of the tree belt. Either timber cladding or at least full cladding would be preferable; the Landscape officer has commented in more depth on this aspect.

There will be not impact on the setting of the listed buildings, so no comments in relation to these, although please ensure that the DCC archaeology officer comments are noted and any conditions/requirements are adhered to.

### **TDC Senior Arboricultural Officer:**

There are no Arboricultural objections to the proposal subject to the access drive being of a no-dig construction where it is constructed within the root protection areas of retained trees.

### **Historic England:**

This application appears to be a repeat of the 2018 planning application No. 18/02039/FUL with additional information responding to concerns raised in response to the 2018 application, including heritage concerns raised by Historic England. The applicant has prepared a heritage statement which seeks to deal with our concerns. Unfortunately this does not appear to have been prepared by a professional heritage consultant, nor does it appear to have been compiled with reference to current best practice guidance in undertaking such assessment, such as the Government's *Planning Practice Guidance* or Historic England's own *Good Practice Advice Note 3, The Setting of Heritage Assets*. As such this assessment fails to consider the impact of the proposed development upon the significance that nearby designated heritage assets derive from their settings and cannot be considered to be an adequate assessment of setting impacts.

However, in this instance I have been able to make a visit and view the proposed development site from the public highway. From the local topography and disposition of the scheduled barrows in relation to the proposed development site I am able to make the conclusion that there will be no adverse impact upon the significance that these monuments derive from their settings.

This is the only point where I agree with a conclusion of the heritage statement. As this is the key concern from Historic England's perspective it is not necessary for me to make a detailed critique of this document.

It is recommended that your authority heeds the advice of Devon Historic Environment Service in respect of the potential impacts of the proposed development upon undesignated archaeology.

**Recommendation**

Historic England has no objection to the application on heritage grounds.

**Devon County Archaeology:**Comments dated 2 December 2019

The proposal is sited in an area of archaeological interest and potential relating to Bronze Age, Iron Age and Romano-British field systems and associated activity. Although the proposal has sought to reduce direct impacts, there remains the possibility that groundworks will impact on archaeological deposits. Should your authority be minded to grant consent then I would recommend that this application should be supported by the submission of a Written Scheme of Investigation (WSI) setting out a programme of archaeological work to be undertaken in mitigation for the loss of heritage assets with archaeological interest. The WSI should be based on national standards and guidance and be approved by the Devon County Historic Environment Team.

If a Written Scheme of Investigation is not submitted prior to determination the Historic Environment Team would advise, for the above reasons and in accordance with paragraph 199 of the National Planning Policy Framework (2018) and with the supporting text in paragraph 5.17 of the Teignbridge Local Plan Policy EN5 (adopted 2013), that any consent your Authority may be minded to issue should include a pre-commencement condition requiring the submission of a WSI.

Comments dated 14 May 2020 following the submission of a WSI

The WSI that was submitted is fine. Its implementation will, in my opinion, satisfy the condition.

**Devon County Highways:**

Refer to standing advice.

**Devon County Minerals:**

No objections.

**Devon Stone Federation:**

No objections.

**6. REPRESENTATIONS**

A site notice was erected.

No letters of representation have been received.

**7. TOWN / PARISH COUNCIL'S COMMENTS**

Ipplepen Parish Council have raised no objections.

**8. COMMUNITY INFRASTRUCTURE LEVY**

The CIL liability for this development is Nil as the CIL rate for this type of development is Nil and therefore no CIL is payable.

## **9. ENVIRONMENTAL IMPACT ASSESSMENT**

Due to its scale, nature and location this development will not have significant effects on the environment and therefore is not considered to be EIA Development.

## **10. HUMAN RIGHTS ACT**

The development has been assessed against the provisions of the Human Rights Act, and in particular Article 1 of the First Protocol and Article 8 of the Act itself. This Act gives further effect to the rights included in the European Convention on Human Rights. In arriving at this recommendation, due regard has been given to the applicant's reasonable development rights and expectations which have been balanced and weighed against the wider community interests, as expressed through third party interests / the Development Plan and Central Government Guidance.

## **Business Manager – Strategic Place**