

43/17/0110

BLOOR HOMES SOUTH WEST

Application for approval of reserved matters following outline application 43/11/0104 for the erection of 119 No. dwellings with associated access, scale, appearance and layout at Phase 3 on land at Longforth Farm, Wellington

Location: LAND AT LONGFORTH FARM, LONGFORTH ROAD,
WELLINGTON, TA21 8RS

Grid Reference: 313567.121573 Reserved Matters

Recommendation

Recommended decision: Conditional Approval

Recommended Conditions (if applicable)

1. The development hereby permitted shall be carried out in accordance with the following approved plans:

SW096-PD-752 Floor Plans & Elevations plots Garage
SW096-PD-751 Floor Plans & Elevations plots Garage
SW096-PD-750 Floor Plans & Elevations plots Garage
SW096-PD-503 Floor Plans & Elevations plots 368-369
SW096-PD-502 Floor Plans & Elevations plots 350-351
SW096-PD-501 Floor Plans & Elevations plots 348-349, 364-365, 366-367
SW096-PD-500 Rev A Floor Plans & Elevations plots 370-371
SW096-PD-145 Rev A Floor Plans plots 385-386
SW096-PD-144 Rev A Elevations plots 385-386
SW096-PD-143 Rev A Floor Plans plots 390-395
SW096-PD-142 Rev A Elevations plots 390-395
SW096-PD-141 Floor Plans plots 396-401
SW096-PD-140 Elevations plots 396-401
SW096-PD-139 Floor Plans & Elevations plots 326
SW096-PD-138 Floor Plans & Elevations plots 331, 359, 417
SW096-PD-137 Floor Plans & Elevations plots 317, 360
SW096-PD-136 Rev A Floor Plans & Elevations plots 334, 353, 353, 378,
406, 410, 416, 418
SW096-PD-135 Rev A Floor Plans & Elevations plots 316, 321, 347, 354, 384
SW096-PD-134 Rev A Floor Plans & Elevations plots 329, 412, 415
SW096-PD-133 Rev A Floor Plans & Elevations plots 31,324,405, 414
SW096-PD-132 Rev A Floor Plans & Elevations plot 333
SW096-PD-131 Rev A Floor Plans & Elevations plot 424
SW096-PD-130 Rev A Floor Plans & Elevations plot 330
SW096-PD-129 Rev A Floor Plans & Elevations plot 328
SW096-PD-128 Floor Plans & Elevations plots 325,429
SW096-PD-138 Rev A Floor Plans & Elevations plots 325, 429
SW096-PD-127 Rev A Floor Plans & Elevations plot 327
SW096-PD-126 Rev A Floor Plans & Elevations plots 408, 411, 430
SW096-PD-125 Rev A Floor Plans & Elevations plots 377, 413

SW096-PD-124 Rev A Floor Plans & Elevations plot 343
SW096-PD-123 Rev A Floor Plans & Elevations plot 344
SW096-PD-122 Rev A Floor Plans & Elevations plot 337, 343
SW096-PD-121 Rev A Floor Plans & Elevations plots 312, 428
SW096-PD-120 Floor Plans & Elevations plots 335, 383
SW096-PD-119 Rev A Floor Plans & Elevations plots 358, 376, 409, 419
SW096-PD-118 Floor Plans & Elevations plots 332
SW096-PD-117 Rev A Elevations plots 322
SW096-PD-116 Floor Plans plots 318-319, 356-357
SW096-PD-115 Elevations plots 318-319, 356-357
SW096-PD-114 Floor Plans plots 335-336, 345-346
SW096-PD-113 Floor Plans & Elevations plots 335-336, 345-346
SW096-PD-112 Floor Plans & Elevations plot 320
SW096-PD-111 Floor Plans & Elevations plot 323
SW096-PD-110 Floor Plans & Elevations plots 338, 352, 407
SW096-PD-109 Rev A Floor Plans & Elevations plots 361, 387
SW096-PD-108 Floor Plans & Elevations plots 339, 340
SW096-PD-107 Floor Plans & Elevations plots 341-342
SW096-PD-106 Floor Plans & Elevations plots 341-342
SW096-PD-105 Rev A Floor Plans & Elevations plots 313-314, 379-382,
388-289
SW096-PD-100 Floor Plans & Elevations plots 372-373, 374-375
SW096-PD-101 Elevations plots 402-404
SW096-PD-102 Floor Plans plots 402-404
SW096-PD-103 Elevations plots 425-427
SW096-PD-104 Floor Plans plots 425-427
SW096-EN-3293 Rev A Proposed Planning Levels Sheet 3 of 3
SW096-EN-3292 Rev A Proposed Planning Levels Sheet 2 of 3
SW096-EN-3291 Rev A Proposed Planning Levels Sheet 1 of 3
SW096-EN-3290 Rev A Proposed Planning Levels overview
SW096-EN-3010 Rev B Section 38 Adoption
SW096-EN-3002 Rev D Refuse Vehicle Tracking
SW096-EN-3001 Rev E Junction and Forward Visibilities
SW096-SL-902b Refuse and Parking Strategy
SW096-SL-060b Means of Enclosure
SW096-SL-020b Material Layout
SW096-SL-001b Site Layout
SW096-SL-001b-COL Site Layout
SW096-PD-062A Street Scene
SW096-PD-061A Street Scene
SW096-PD-060A Street Scene
SW-LS-012A Landscape Concept

Reason: For the avoidance of doubt and in the interests of proper planning.

2. Prior to the commencement of the development hereby permitted a detailed schedule of works for the laying out and planting of the new orchard including the translocation of existing dead and alive trees from the existing orchard and a timing of works shall be submitted to and approved in writing by the Local Planning Authority. The detailed schedule of works and timings shall be strictly adhered to in the carrying out of the works.

Reason: To protect the wildlife interests and habitats within the existing orchard.

Reason for pre-commencement: To ensure that existing wildlife habitat is properly considered and protected during the course of the development.

3. (i) A landscaping scheme shall be submitted to and approved in writing by the local Planning Authority prior such a scheme being implemented. The scheme shall include details of the species, siting and numbers to be planted.

(ii) The scheme shall be completely carried out within the first available planting season from the date of occupation of 50% of the dwellings hereby approved.

(iii) For a period of five years after the completion of each landscaping scheme, the trees and shrubs shall be protected and maintained in a healthy weed free condition and any trees or shrubs that cease to grow shall be replaced by trees or shrubs of similar size and species.

Reason: To ensure that the proposed development does not harm the character and appearance of the area.

4. Prior to the occupation of the dwellings hereby approved, a lighting design taking into account the need to protect bats shall be submitted to and approved in writing by the local planning authority. The strategy shall:

a) identify those areas/features on site that are particularly sensitive for bats and that are likely to cause disturbance along important routes used to access key areas of their territory, for example, for foraging; and

b) show how and where external lighting will be installed (through the provision of lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent bats using their territory.

All external lighting shall be installed in accordance with the specifications and locations set out in the design, and these shall be maintained thereafter in accordance with the design. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority.

Reason: In the interests of the Favourable Conservation Status of European protected species.

5. The materials specified within the drawings hereby approved shall be used in the carrying out of the development hereby permitted unless otherwise agreed in writing by the Local Planning Authority. The facing materials for each plot shall be installed prior to the occupation of that plot and shall thereafter be maintained as such.

Reason: In the interests of the character and appearance of the area and also to allow flexibility should the need to deviate from the approved materials

plans arise.

6. The development hereby permitted shall not be commenced until details of a strategy to protect wildlife has been submitted to and approved in writing by the Local Planning Authority for phase 3 of the development. The strategy shall be based on the advice of Clarkson Woods's updated Ecological survey dated June 2017 and the Bat survey report dated May 2017 and include:
 1. Details of protective measures to include method statements to avoid impacts on protected species during all stages of development;
 2. Details of the timing of works to avoid periods of work when species could be harmed by disturbance
 3. Measures for the enhancement of places of rest for the wildlife
 4. An updated Construction Environmental management Plan (CEMP) and Landscape Ecological Management plan (LEMP)
 5. Details of lighting for Phase 3

Once approved the works shall be implemented in accordance with the approved details and timing of the works unless otherwise approved in writing by the Local Planning Authority and thereafter the resting places and agreed accesses for bats and nesting birds shall be permanently maintained. The development shall not be occupied until the scheme for the maintenance and provision of the new bat and bird boxes and related accesses have been fully implemented.

Reason: To protect and accommodate wildlife

Reason for pre-commencement: To ensure that existing wildlife habitat is properly considered and protected during the course of the development.

Notes to Applicant

Proposal

This application seeks reserved matters approval for the erection of 119 dwellings at Longforth Farm, Wellington. It is the final phase of residential development at the site. A narrow strip of open space would be provided between the dwellings and the railway and a larger area of open space, including a new orchard and children's play facilities would be provided to the east of the phase.

Site Description

The site is the north western most part of the Longforth Farm site granted outline planning permission in 2012. The site borders the railway to the north, the Relyon factory to the west. Longforth Farmhouse lies of the southwest corner of the site, although it is outside the application site. The southern edge of the site is lined by trees which sit on the northern side of a recently constructed estate road with dwellings facing toward the site. The north western corner of the site slopes up to a bridge over the railway (which carries a public footpath). Moving to the east through the site, the land drops off steeply and is lowest in the northeast corner.

Relevant Planning History

Outline planning permission was granted, reference 43/11/0104 for the development of up to 503 dwellings. Reserved matters for two earlier phases have been approved under applications 43/13/0013 and 43/15/0143.

Consultation Responses

WELLINGTON TOWN COUNCIL – Recommend that permission be granted subject to there being no delay being caused to the completion of the road to Relyon.

SCC - TRANSPORT DEVELOPMENT GROUP – I refer to your letter received 17 October 2017 regarding the above planning application, and apologise for the delay in this response. The Highway Authority has the following observations on the highway and transportation aspects of this proposal following consideration of the application details and a site visit carried out on 8 November 2017.

Traffic Impact

The current application is for reserved matters following the grant of outline planning permission at this site, and thus the expected traffic impacts of this proposal have already been considered and deemed acceptable. Indeed, the submitted Planning Statement states that the number of dwellings is some 73 less than originally proposed, with a resultant reduction in the trips expected to be generated compared to the levels already accepted by the Local Planning Authority.

Travel Plan

An agreement under Section 106 of the Town and Country Planning Act 1990 was signed on 16 January 2013, which included the securing of the provision of a Travel Plan (TP) for the whole development for which outline planning permission was granted. The signed S106 agreement included a table of standard measures to be implemented and a timetable for delivery.

Parking

The optimal parking provision for this site as set out in the adopted Somerset County Council Parking Strategy (SPS) for a residential development in a Zone B area such as this location is...119 dwellings is therefore between 303 and 327 parking spaces, depending on how facilities for visitors are managed. From the details provided, the proposed overall parking provision of 307 spaces is nominally within the optimum range, but from the proposed arrangements it appears that parking for visitors has not been fully catered for.

Furthermore, no reference is made within the application details to cycle parking or charging facilities for electric vehicles, both of which are stipulated within the SPS (one cycle parking space per bedroom and a suitable charging facility for each dwelling). It is recommended that the applicant confirm with sufficient detail that the optimum car and cycle parking facilities will be provided as part of this development.

Highway Works

Access

Access to the site will be via the roundabout and distributor road linking to B3187 from the overall site development, which has been granted full planning approval and has therefore already been considered as suitable.

The access to this phase 3 section for development will be through roads already expected to be adopted under a Section 38 agreement, and thus will be suitable for the access proposed.

Estate Roads

The applicant should be aware that it is likely that the internal layout of the site will result in the laying out of a private street and as such under Sections 219 to 225 of the Highways Act 1980, will be subject to the Advance Payments Code. However, the applicant has submitted a plan (SW096-EN-3010) showing roads and footpaths to be offered for adoption. The proposals have been reviewed by the Highway Authority's estates roads team, to identify any issues that may need to be addressed to assist the applicant developing designs suitable for future adoption, and it is recommended that these be reviewed at this stage to ensure suitable amendments can be achieved within the layout proposed for planning approval.

Drawing number SW096-EN-3010/A indicates the presence of adoptable shared surfaces, but these seem to be provided with footways rather than being a shared area. Shared surfaces are usually constructed in block paving with margins in lieu of footway and the design should be clarified.

Drawing number SW096-EN-3010/A indicates that two footpath links (one running between plots 405 and 407 and the other link extending off the turning head adjacent to plot 331) will be offered to SCC for adoption. Due to the possibility of these links being used by a combination of pedestrians and cyclists, they should be constructed to a minimum width of 3.0m, adequately lit and drained and with adoptable visibility splays (2.0m x 20.0m) provided where the links connect onto the footway that runs along the southern site boundary together with the footway/margin within the development site. There shall be no obstruction to visibility within the required splays that exceeds a height greater than 600mm above the adjoining carriageway level and the full extent of the splays should be included within all future revisions of the engineering layout drawings.

The maintenance arrangements for the remainder of pedestrian routes within the Public Open Space area should be confirmed.

To assist in pedestrian movement the proposed footway that is shown as terminating outside plot 360 should be extended around the carriageway radius as far as the northern flank wall of plot 360.

It is unclear if the proposed block paved features will have vertical deflections built into their design. The length of the carriageway serving plots 312 to 428 will require traffic calming to slow vehicles due to the length of straight carriageway.

The parking bays serving plots 372-375, 387-392 and 396-401 should be constructed to a minimum length of 5.5m as measured from the back edge of the prospective public

highway boundary.

Some private drives will serve more than two dwellings. To help address Advance Payments Code legislation, it will be necessary for these drives to be constructed to an acceptable standard in terms of materials used and compaction of said materials.

Surface water from any private areas will not be permitted to discharge onto the prospective public highway. Entrances to all private courtyards should be constructed to a minimum width of 4.1m to allow for two-way vehicle movement and prevent queuing upon the highway.

Drawing number SW096-EN-3001/C indicates an adoptable forward visibility splay across the corner of plot 360. However, this splay has not been included within drawing number SW096-EN-3010/A (Section 38 Adoption Plan). All visibility splays to be adopted by SCC must be clearly shown within all future revisions of drawing number SW096-EN-3010 and the developer must ensure such splays are not conveyed to individual plots.

No visibility splay has been shown at the point of access onto the existing estate roads. Suitable visibility should be shown on the plans and the visibility splay included with any roads and footways offered for adoption.

Drawing number SWS096-EN-3001/C indicates that small areas of the required visibility splays fronting plots 333 and 343 will fall beyond the back of the proposed footways. The applicant must ensure that the full extent of the splays are contained within the footways, even if this means localised widening of the footways.

If the developer so desired, the proposed limits of adoption could be extended between plots 412 and 415 with an adoptable turning head provided at the end of the extended carriageway to reduce the number of properties served by the remaining private drive to two.

Under Section 141 of the Highways Act 1980, no tree or shrub shall be planted within 4.5m of the centreline of a made up carriageway. Trees are to be a minimum distance of 5.0m from buildings, 3.0m from drainage/services and 1.0m from the carriageway edge. Root barriers of a type to be approved by SCC will be required for all trees that are to be planted either within or immediately adjacent to the highway to prevent future structural damage to the highway. A comprehensive planting schedule, showing all planting either within or immediately adjacent to the highway, should be submitted to SCC for checking/approval purposes.

No doors, gates or low level windows, utility boxes, down pipes or porches are to obstruct footways/shared surface roads. The Highway limits shall be limited to that area of the footway/carriageway clear of all private service boxes, inspection chambers, rainwater pipes, vent pipes, meter boxes (including wall mounted), steps etc. The Developer must keep highways, including drains and ditches in the vicinity of the site works free from mud, debris and dust arising from the works at all times. The Developer shall ensure that vehicles leaving the site do not carry out and deposit mud or debris onto the highway and shall provide such materials, labour and equipment as necessary to ensure compliance with this requirement.

The Developer shall be held responsible for any damage caused to public highways by construction traffic proceeding to/from the site. Any construction traffic will be classed as 'extra-ordinary traffic' on public highways. Photographs shall be taken by the Developer's representative in the presence of the Highway Supervisor showing the

condition of the existing public highways adjacent to the site and a schedule of defects agreed prior to works commencing on site.

Existing road gullies/ drains shall be completely cleared of all detritus and foreign matter both at the beginning and end of the development. If any extraneous matter from the development site enters an existing road drain or public sewer, the Developer shall be responsible for its removal.

Drainage

The construction of a new headwall at the point of outfall into the existing ditch is noted. Permission to carry out temporary or permanent works within the ordinary watercourse will require the consent of the LLFA. The designer should contact Didier Lebrun for information at the following address: JLebrun@somerset.gov.uk.

Conclusions

The principle of the proposed development has already been agreed at outline stage, which included a review of the expected traffic impacts from the proposals. Suitable access will be available for this stage of the overall development.

The developer of the overall site is currently in breach of an existing Section 106 Agreement relating to the outline planning permission which required the provision of an agreed Travel Plan and implementation of a number of measures in accordance with an agreed timetable. It is recommended that the Local Planning Authority give consideration to appropriate action in relation to this breach of agreement, and a condition is recommended to require the provision and agreement of a Travel Plan as part of any approval granted for this reserved matters application.

The parking proposals do not provide sufficient facilities for visitors, cycles or the charging of electric vehicles and this should be addressed by the applicant.

A number of detailed issues have been identified regarding the proposed estate road layout, and it is recommended that these be reviewed by the applicant to ensure that they can be successfully resolved within the layout proposed for approval, or that suitable changes are made to the layout prior to planning approval being granted.

The applicant must ensure that they acquire any necessary permission(s) for works within the existing watercourse.

With the above in mind, the Highway Authority recommends that the following conditions be imposed if planning permission is granted:

LANDSCAPE – I am disappointed to see that the new layout does not include the traditional apple orchard with associated semi improved grassland. I concede that the orchard is neglected but orchards are Priority Habitats for Somerset County BAP (Wild Somerset). These features in the Somerset landscape should be retained and enhanced.

In addition open space in this locality will be more accessible to house dwellers in phases 2 and 3.

HERITAGE – Longforth Farmhouse was listed at grade II in 1976. The building and its surroundings were evaluated in the 2011 Terence O'Rourke Ltd report and particularly Chapter 6 on Cultural Heritage.

I would have to say that having read the report, I am surprised that there is a proposal for this site. In 6.78 to 6.82 the case is made for the wider development whilst retaining the traditional orchard to protect the setting of the Listed farmhouse and also considers that it has value itself. This report predates the National Planning Policy Framework but in my view and in the spirit of the report it would now be regarded as an undesignated heritage asset.

The 2017 Terence O'Rourke report seeks to rescind 6.79 of the previous document and place a lower significance on the orchard and its importance to the setting of the listed Building. The rationale for this is not clear. It also fails to take account of recent high court rulings relating to setting. *Steer vs SSCLG 2017* clarified that setting is not just about the view between a heritage asset and development. It takes a much wider view. It requires the assessment of all views of the site where the heritage asset and the development can be seen. In this case the farmhouse and orchard will be highly visible from all of the surrounding development. I suspect that the impact of the development to the setting is high end less than substantial harm as described in Chapter 12 of NPPF. It could even be substantial harm by their own admission. At this stage we don't have any information to assess the wider setting issues against so paragraph 128 of the NPPF has not been met. We can only make a decision to refuse due to lack of information at this stage. Any argument that this is less than substantial harm with public benefit to offset it would require a proper setting analysis that reflects the *Steer vs SCCLG* decision.

The information that we do have in the new submission is paragraph 3.97. It deletes paragraph 6.81 of the 2011 document that designates the orchard as a NEAP and LEAP.

The most significant statement in the 2017 document is paragraph 3.100. It deletes paragraph 6.83 of the previous document and replaces it with the following statement.

"The amended proposals for phase 3 will introduce built development to the north east of the farmhouse, in an area previously occupied by the large traditional orchard, and divided from the boundary of the house by a narrow landscaped area. The change in setting through the change in the function of the surrounding land and proximity of development will result in a small to medium change to the asset of high importance which will be moderate to substantial affect that is significant".

This is a fairly meaningless statement. It is probably all that could be written given the document already submitted. It means that the area of NPPF used to determine the proposal is unclear. One or more of these tests apply.

133. Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- the nature of the heritage asset prevents all reasonable uses of the site

- no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation
- conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible
- the harm or loss is outweighed by the benefit of bringing the site back into use

134. 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 securing its optimum viable use.

135. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

Based on the information before me, I have strong concerns regarding this proposal. At best it represents high level 'less than substantial harm' to the setting of the farmhouse so 134 needs to be considered. The public benefit is not clear. We have a 5 year housing supply so the benefit would be private. The additional information requested on setting will clarify whether this is actually substantial harm so only permissible if 133 is met. I have seen nothing to suggest that this test has been complied with.

It fails against 135 as it destroys an undesignated asset without providing clear benefit.

LEAD LOCAL FLOOD AUTHORITY – The applicant is proposing to discharge directly to the existing attenuation pond constructed at phase 1 and designed to accommodate surface water flows from the entire site. The LLFA has no objections to this application as submitted.

HOUSING ENABLING - The requirement is for 10% affordable housing with a minimum of 50% social rent and a maximum of 50% intermediate affordable housing. The proposed scheme incorporates:

8 Social Rented Units (67%) - 2 x 1 b flats, 4 x 2 b dwellings and 2 x 3 b dwellings
 4 Shared Ownership Units (33%) - 2 x 2 b dwellings, 2 x 3 b dwellings

This is considered broadly acceptable, although the 3 bed units for shared ownership are small (3 bed 4 person) and these would be improved significantly if changed to 3 bed 5 person.

The Plan SW096-SI-001-COL shows the intermediate units to be Shared Ownership, whilst the Planning Statement refers to these units being Shared Equity. For clarification, we would wish to see these units as Shared Ownership.

Additional guidance is available within the Adopted Affordable Housing Supplementary Planning Guidance.

The developer should seek to provide the Housing Association tied units from Taunton Deane's preferred affordable housing development partners list.

LEISURE DEVELOPMENT – No further comments to make as a signed S106 Agreement is in place. However, Open Spaces should be asked to comment on the landscaping and details of the design and content of the LEAP and NEAP when submitted.

BIODIVERSITY – The application is for approval of reserved matters following outline for the erection of 119 dwellings at Phase 3 on land at Longforth farm, Wellington Clarkson woods carried out an updated Ecological survey of the site between March 2016. The report is dated June 2017. A Bat Survey Report was carried out in May 2017 Findings are as follows:

Habitat

The site comprises arable land, a traditional orchard with semi improved grassland, a farmyard with buildings and hedgerows.

The applicant wishes to remove the orchard and so this report assumes this course of action and has suggested compensation by the creation of a new orchard in the public open space.

I am would prefer to see the retention and enhancement of the orchard.

New habitats (three ponds, a swale, and areas of hedgerow, scrub and woodland planting) under the original outline application have already been created on site. Where will the new 50m stretch of hedgerow referred to in the bat report (7.8.9) be located?

Reptiles

Habitats onsite, including the orchard, support reptiles and so these individuals will need to be translocated

Great crested newts

Based on previous licensable GCN translocations and given the distance of the site from the breeding ponds, work should follow a precautionary approach.

Badgers

A licence from Natural England will be required to develop the site.

Dormice

As dormice have been recorded on site a mitigation licence will be required to develop this phase of housing.

Bats

The site is considered to provide foraging and commuting opportunities for bats as identified in the updated bat report. The buildings were assessed as having negligible potential to support crevice roosting bats.

Birds

The site is likely to support nesting birds, and wintering birds.

Clearance of vegetation should take place outside of the bird-nesting season. I support the recommendation to erect bird boxes within the newly built houses.

Invertebrates

The dead and over mature orchard trees and semi improved grassland associated with the orchard provides potential invertebrate habitat.

The report refers to an Ecological and conservation management and Enhancement plan which provides details of ecological enhancement across the site. The provision of enhancements has already been partially undertaken however if the orchard is removed further enhancement is required.

Conditions are recommended.

SCC – ECOLOGY - Having reviewed the submitted ecology reports I generally support the comments made by the biodiversity officer and her recommendations. However, I would emphasise the rarity of some of the invertebrate species found in the orchard and the status of that habitat, which a priority habitat listed in s41 of the Natural Environment and Rural Communities Act 2006. Under the Act the local planning authority is obliged to have regard for the conservation of such habitats. Although Clarkson Woods state that there is a 'relatively low diversity' the Invertebrate Survey (Gibbs, 2016) of the orchard lists four nationally scarce species and one species listed as RDB3 (Red Data Book, JNCC). Two of these species are very rare in Somerset and one, *Drapetis aruata*, is the first record in the County and is very rarely encountered elsewhere. The site is likely to qualify as a Local (County) Wildlife Site. The orchard is also an important foraging site for bats which indicates a high abundance of invertebrates even if the night time diversity is not known. No survey was made of night flying invertebrates. We also do not know if the apple trees are of a rare local Somerset variety. The removal of the orchard is likely to see the local extinction of rare and very rare invertebrate species including one never recorded in Somerset before. A new orchard as suggested by Clarkson Woods will not provide the invertebrate abundance for some time, probably in the long term. I would strongly recommend that the master plan is revised to retain the orchard, a S41 (UKBAP) habitat, and enhanced with a corridor of access to outside the development site for bats and other wildlife as recommended in the Invertebrate report in 2016.

I note a barbastelle bat was recorded on the automated detector between 29 June and 4 July 2016 on average of 1 pass per night (no time on site is given) suggesting a commuting individual heading toward or from its hunting patch in the what is likely to be the orchard. Transect surveys often do not pick up barbastelle bats.

Barbastelle bats have exclusive individual hunting territories within the home range of a maternity colony which I presume is the tree in the middle of the field to the east of the application site. However, no detector was placed within the orchard where moth abundance is likely. Hunting barbastelle bats echolocate at a range of 3 metres to avoid detection by tympanate moths so are likely to be difficult in recording.

In addition to the biodiversity officer's recommendations, and given the presence of light sensitive bats, I would also recommend that a condition is imposed requiring a detailed lighting design to safeguard bats.

SCC - RIGHTS OF WAY - I can confirm that there are public rights of way (PROW) recorded on the Definitive Map that abut the site at the present time (**public footpaths WG 17/16 and 17/17**). I have attached a plan for your information. We have no objections to the proposal, but the following should be noted:

1. Specific Comments

Whilst we are aware of the desire to divert WG 17/17 in order that the level crossing can be closed, the application should provide for a more direct connection to WG 17/17, preferably via the proposed adoptable footway, on the basis that there can be no guarantees that any application to divert WG 17/17 will be successful.

2. General Comments

Any proposed works must not encroach on to the width of the PROW. The health and safety of the public using the PROW must be taken into consideration during works to carry out the proposed development. Somerset County Council (SCC) has maintenance responsibilities for the surface of a PROW, but only to a standard suitable for the public use. SCC will not be responsible for putting right any damage occurring to the surface of a PROW resulting from vehicular use during or after works to carry out the proposal. It should be noted that it is an offence to drive a vehicle along a public footpath, public bridleway or restricted byway unless the driver has lawful authority (private rights) to do so.

If it is considered that the development would result in any of the outcomes listed below, then authorisation for these works must be sought from Somerset County Council Rights of Way Group:

- A PROW being made less convenient for continued public use.
- New furniture being needed along a PROW.
- Changes to the surface of a PROW being needed.
- Changes to the existing drainage arrangements associated with the PROW.

If the work involved in carrying out this proposed development would:

- make a PROW less convenient for continued public use; or
- create a hazard to users of a PROW,

then a temporary closure order will be necessary and a suitable alternative route must be provided. For more information, please visit Somerset County Council's Rights of Way pages to apply for a temporary closure:

<http://www.somerset.gov.uk/environment-and-planning/rights-of-way/apply-for-a->

temporary-closure-of-a-right-of-way/ .

ENVIRONMENTAL HEALTH - NOISE & POLLUTION - I refer to some information that has been submitted regarding the above development.

- A Noise Assessment for Phase 3, Longforth Farm, Wellington. 22/08/2017, Rebound Acoustics Limited The report gives details of noise monitoring carried out at the site in 2014, in particular monitoring of noise from the railway line that runs along the northern boundary of the site. Calculations were carried out to predict noise level as the facades of the residential properties and this was used to estimate the amount of sound reduction required to achieve an acceptable level of internal noise.

The report makes some recommendations for the standard of glazing that would be required, and gives an example of glazing that could achieve this. It also states that where the level of sound reduction required exceeds a certain amount the windows will need to be closed to achieve the required criteria, and so an alternative form of ventilation will be required. A specification is given for the level of sound reduction performance of the ventilators that should be used.

The report refers to the World Health Organisation (WHO) guidance on internal noise levels. One of the WHO criteria is a maximum noise level at night of 45dB not to be exceeded 10 to 15 times a night. The Rebound report states that it may be impractical to incorporate glazing with a high enough sound reduction performance to achieve this level, and with the glazing they recommend result it could be exceeded 13 times a night. Rebound state that a criterion of 55dB as a maximum is achievable.

Comment

The report does not give any details of the noise from the adjacent industrial site (which is mentioned in the planning condition for the 2011 permission). Some noise monitoring was carried out in 2014 close to the factory, but only for an hour during the day.

However, the site can operate for 24 hours a day and there is could be noise from machinery and vehicle/HGV movements. The developer should obtain information on the type of activities at the site, an assessment of the potential for these to disturb future residents and recommendations for noise mitigation if required.

Even if some mitigation is incorporated into the properties next to the industrial site (which is most likely to be acoustic glazing and ventilation) some noise may be audible in the closest properties if the site is active at night.

With regard to the noise from the railway, the report shows that is it possible to achieve a reasonable level of internal noise in the residential properties with suitable glazing and ventilation. However, the maximum noise levels at night are still likely to be higher than those given in the WHO guidance, unless the developer is able to incorporate a higher specification of glazing and ventilation. While the WHO levels are for guidance (and are not statutory levels that have to be met) it would be good if the developer could try to achieve these.

Even with recommended specification of glazing the noise from trains will still be audible inside the houses, in particular the peak noise levels at night.

The developer should

- Provide details and an assessment of the potential noise from the adjacent factory, which can operate 24 hours a day.
- Ensure that the glazing and ventilation in the buildings close to the railway meet the specification outlined in the Rebound Acoustics 2017 report.

WESSEX WATER - Sewerage infrastructure

The site will be served by separate systems of drainage to be constructed to current adoptable standards. Please see Wessex Water's guidance notes 'DEV011G – Section 104 Sewer Adoption' and 'DEV016G - Sewer Connections' for further guidance Phase 3 foul drainage proposals and points of connection to be agreed at detailed design stage in consultation with Wessex Water. Applicant should contact local development engineer, development.west@wessexwater.co.uk

The Drainage Layout plans indicate surface water discharged to local land drainage systems which will be subject to approval by the appropriate authority.

Surface Water connections to the public foul sewer network will not be permitted. Land drainage run-off shall not be permitted to discharge either directly or indirectly to the public sewerage system.

NETWORK RAIL - We would remind the council that Network Rail objected to this proposal should the proposed diversion of the public footpath WG17/17 not go ahead.

Network Rail now has to put together an application to Somerset County Council for the diversion of the footpath as the developer failed to secure the diversion although we understand the developer is willing to fund the application.

It should be noted that the below information is done with a caveat that we have been unable to complete a full report on this matter.

The Railway at the location in question was originally authorised under the Bristol and Exeter Railway Act 1836.

The Deposited Plan and the Book of Reference confirm that there was not a pre-existing right of way at this location. Therefore this bridge was built as an accommodation structure for the private use of the landowner who's lands the construction of the railway severed.

The online Definitive Map shows a Public Right of Way crossing this bridge. This is referenced as PRoW WG17/16.

Only the landowner would have vehicular rights over the bridge. However, if the

land on either side of the line has been sold separately at any time then any private rights to cross the bridge may have been lost. This may need further investigations. I can confirm that the bridge is owned by Network Rail and that we are responsible for its maintenance.

POLICE ARCHITECTURAL LIAISON OFFICER – Comments as follows:

Crime Statistics – reported crime for the area of this application (within 500 metre radius of the grid reference) during the period 01/10/2016-30/09/2017 is as follows:-

Burglary - 2 Offences (incl. 1 Residential Burglary)

Criminal Damage – 18 Offences (incl. 5 criminal damage to dwellings & 7 criminal damage to vehicles)

Drug Offences - 1

Other Offences - 6

Sexual Offences - 6

Theft & Handling Stolen Goods - 14 Offences (incl. 4 theft from motor vehicles and 1 theft of pedal cycle)

Violence Against the Person – 74 offences (incl. 3 wounding, 8 assault ABH, 18 common assault & battery & 22 causing harassment, alarm, distress)

Total - 121 Offences

This averages 10 offences per month, which is classed as an ‘average’ level of reported crime.

Layout of Roads & Footpaths – vehicular and pedestrian routes appear to be visually open and direct and are likely to be well used enabling good resident surveillance of the street. The proposed use of physical or psychological features i.e. rumble strips and road surface changes by colour or texture at the road intersections helps reinforce defensible space giving the impression that the area is private and deterring unauthorised access.

Communal Areas – communal areas have the potential to generate crime, the fear of crime and anti-social behaviour and should be designed to enable surveillance from nearby dwellings with safe routes for users to come and go. The LEAP and NEAP on the eastern edge of the proposed development appear to be overlooked by six proposed dwellings and by a number of existing dwellings to the south, which should prove sufficient. The footpath along the northern boundary of the development also appears to be well overlooked from nearby dwellings.

Orientation of Dwellings – all the dwellings appear to overlook the street and public areas which allows neighbours to easily view their surroundings and also makes the potential criminal feel more vulnerable to detection. A large proportion of dwellings are also back to back, which is also recommended, as this restricts unauthorised access to the vulnerable sides and rear of dwellings.

Dwelling Boundaries – it is important that all boundaries between public and private space are clearly defined and it is desirable that dwelling frontages are kept open to view to assist resident surveillance of the street and public areas, so walls, fences, hedges at the front of dwellings should be kept low, maximum height 1 metre, to assist this. Vulnerable areas such as exposed side and rear gardens need more robust defensive measures such as walls, fences or hedges to a minimum

height of 1.8 metres. Gates providing access to rear gardens should be the same height as the adjacent fencing and lockable. The Boundary Treatments plan indicates that this advice will be complied with.

Car Parking – a large proportion of the dwellings appear to incorporate in curtilage garages and parking spaces, which complies with police advice. All the communal on-street parking spaces appear to be in small groups, close to and overlooked by owner's homes, which is also recommended.

Landscaping/Planting – should not impede opportunities for natural surveillance and must avoid the creation of potential hiding places. As a general rule, where good visibility is needed, shrubs should be selected which have a mature growth height of no more than 1 metre and trees should be devoid of foliage below 2 metres, so allowing a 1 metre clear field of vision. This is particularly relevant in respect of the planting between the dwellings and Play Areas and footpath along the northern boundary.

Street Lighting – all street lighting for adopted highways and footpaths, private estate roads and footpaths and car parking areas should comply with BS 5489:2013.

Physical Security of Dwellings – in order to comply with **Approved Document Q: Security - Dwellings** of building regulations, all easily accessible doorsets that provide access into a dwelling and ground floor or easily accessible windows and rooflights must comply with PAS 24:2016 security standard or equivalent.

Secured by Design - the applicant is encouraged to refer to the '**SBD Homes 2016**' design guide available on the police approved Secured by Design website – www.securedbydesign.com – which provides further comprehensive guidance regarding designing out crime and the physical security of dwellings.

SCC - ECOLOGY - Having reviewed the submitted ecology reports I generally support the comments made by the biodiversity officer and her recommendations. However, I would emphasise the rarity of some of the invertebrate species found in the orchard and the status of that habitat, which a priority habitat listed in s41 of the Natural Environment and Rural Communities Act 2006. Under the Act the local planning authority is obliged to have regard for the conservation of such habitats.

Although Clarkson Woods state that there is a 'relatively low diversity' the Invertebrate Survey (Gibbs, 2016) of the orchard lists four nationally scarce species and one species listed as RDB3 (Red Data Book, JNCC). Two of these species are very rare in Somerset and one, *Drapetis aruata*, is the first record in the County and is very rarely encountered elsewhere. The site is likely to qualify as a Local (County) Wildlife Site. The orchard is also an important foraging site for bats which indicates a high abundance of invertebrates even if the night time diversity is not known. No survey was made of night flying invertebrates. We also do not know if the apple trees are of a rare local Somerset variety. The removal of the orchard is likely to see the local extinction of rare and very rare invertebrate species including one never recorded in Somerset before. A new orchard as suggested by Clarkson Woods will not provide the invertebrate abundance for some time, probably in the long term. I would strongly recommend that the master plan is revised to retain the orchard, a

S41 (UKBAP) habitat, and enhanced with a corridor of access to outside the development site for bats and other wildlife as recommended in the Invertebrate report in 2016.

I note a barbastelle bat was recorded on the automated detector between 29 June and 4 July 2016 on average of 1 pass per night (no time on site is given) suggesting a commuting individual heading toward or from its hunting patch in the what is likely to be the orchard. Transect surveys often do not pick up barbastelle bats.

Barbastelle bats have exclusive individual hunting territories within the home range of a maternity colony which I presume is the tree in the middle of the field to the east of the application site. However, no detector was placed within the orchard where moth abundance is likely. Hunting barbastelle bats echolocate at a range of 3 metres to avoid detection by tympanate moths so are likely to be difficult in recording.

In addition to the biodiversity officer's recommendations, and given the presence of light sensitive bats, I would also recommend that the following be conditioned:

Prior to any occupation, a "lighting design for bats" shall be submitted to and approved in writing by the local planning authority. The strategy shall:

- a) identify those areas/features on site that are particularly sensitive for bats and that are likely to cause disturbance along important routes used to access key areas of their territory, for example, for foraging; and
- b) show how and where external lighting will be installed (through the provision of lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent bats using their territory.

All external lighting shall be installed in accordance with the specifications and locations set out in the design, and these shall be maintained thereafter in accordance with the design. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority.
Reason: In the interests of the Favourable Conservation Status of European protected species

I would also request the monitoring for barbastelle bat roost in the field to the east of the Longforth Farm development to determine if the development has affected the roost from the start of the development until this year.

I would request that the master plan be revised to avoid the loss of s41 habitat, rare invertebrate species and bat foraging habitat and an appropriate corridor to it retained.

Subsequently, additional information has been provided and additional comments have been received that support proposed ecological measures to safeguard the impact on barbastelle bats and invertebrates.

NYNEHEAD PARISH COUNCIL – No further comments to make.

NATURAL ENGLAND – No comments to make on this application and refer the Council to their standing advice.

Representations Received

Somerset Wildlife Trust

In general we support the findings of the [submitted ecological] assessment. We would also support the measures proposed for mitigation and enhancement outlined in sections 7.4 to 7.11 and we would request that they are fully implemented and incorporated into the planning conditions if it is decided to approve this application. [In addition] we fully support the comments and suggestions in respect of the retention of the orchard as well as the need for an appropriate lighting plan. If these proposals are not fully agreed and implemented in any planning conditions, then our comments should be recorded as an objection. We are also very concerned that the developers are apparently already undertaking some site clearance in this part of the site and we would request that this work ceases until a decision is made on this application.

26 letters of **objection/concern** have been received from members of the public raising the following points:

- Road access into Relyon is still required. No more houses should be allowed until it is open.
- Schools, doctors surgeries and other infrastructure need to be expanded.
- Social facilities should be provided alongside the housing.
- The percentage of affordable housing is too low.
- The originally proposed allotments seem to have disappeared.
- Electric charging points for vehicles are required for the dwellings.
- Proposals need to be put in place to accommodate wildlife.
- Badgers have been displaced from the site and are digging up existing gardens.
- The orchard should be protected. It supports a great deal of wildlife.
- Wildlife should be left in situ.
- Residents on early phases were advised the orchard would be retained.
- The footpath from Howard Road should be fully reinstated.
- The footpaths should be reopened.
- The orchard area has started to be used for the storage of building materials despite the application still being undetermined.
- Query whether this phase was originally in the Bloor proposals.

Planning Policy Context

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications are determined in accordance with the development plan unless material considerations indicate otherwise.

The development plan for Taunton Deane comprises the Taunton Deane Core

Strategy (2012), the Taunton Site Allocations and Development Management Plan (2016), the Taunton Town Centre Area Action Plan (2008), Somerset Minerals Local Plan (2015), and Somerset Waste Core Strategy (2013).

Relevant policies of the development plan are listed below.

EN12 - TDBCLP - Landscape Character Areas,
ROW - Rights of Way,
EN22 - TDBCLP Dev Affecting Sites of County Archaeological Importance,

Local finance considerations

Not relevant to this reserved matters application.

Determining issues and considerations

This application seeks approval of reserved matters for the final phase of development at Longforth Farm. The principle of development was established at outline stage and cannot be revisited as a consequence of this application.

The issues for determination relate to the reserved matters – layout, appearance, scale landscaping – and the impacts arising from these. Those main issues are the acceptability of the detailed design and layout, the impact on adjoining property, particularly those already built in earlier phases of the development, the impact on biodiversity and the impact on heritage assets.

The application proposes a significant change from the previously approved masterplan and design code in that it proposes to develop houses on the existing orchard area. When the development was originally conceived, the orchard was to be retained as open space, containing the main children's play area. The applicant's agent has put forward a number of reasons why the proposals have been altered as now proposed. These are:

- 1) The need to provide Network Rail with a 2m buffer to their boundary, which was not allowed for on either the original master plan or the original illustrative housing layout;
- 2) advice from Bloor Homes' noise consultants that the original illustrative layout plan was unlikely to be acceptable in noise terms because of the proximity of the housing units to the railway line;
- 3) an updated survey of the trees in the orchard had revealed that a number had died since the outline application had been submitted and that the remainder were in significant decline, prompting a re-evaluation of the land's ecological value;
- 4) much of the northern and eastern parts of the site occupy low-lying land, and Bloor Homes' engineers (Clarke Bond) had advised Bloor that approximately one third of the site needed to be raised by between 1.2 and 1.5 metres in order to enable any dwellings constructed here to have workable foul and surface water drainage solutions (because of the foul and surface water drainage strategies agreed as part of phases 1 and 2 with Wessex Water), with an additional raised

drainage basin requiring construction. Such works were not anticipated at the outline planning application stage, and would not only be very costly but would have potentially significant landscape and visual impacts when viewed from the public footpath (both north and south of the railway), and from phases 1 and 2.

They say that by not developing the north eastern part of the site for housing and keeping it as open space (as currently proposed), no significant, costly or visually intrusive land raising is required and no additional drainage pond is required (which would reduce the quantum of public open space available or number of dwellings on the site).

Design, layout and impact on nearby property

The proposed layout is a significant deviation from the previously approved design code which proposed a relatively high density development of smaller dwellings in this part of the site. The layout was to have a strong structure focussed on the retained orchard. The proposal, by contrast, is of lower density and a much looser form of development, albeit still based upon a relatively strong perimeter block structured layout where dwellings largely back onto one another and front highways. Most parking is on plot, with two parking courts (to the front of the proposed dwellings) and some perpendicular parking in bays to the smaller dwellings and flats. During consideration of the application, various amendments have been made to the layout which strengthen the block structure and reduce the dominance of the highway.

The dwelling types proposed are a different set of dwellings to those that have been built on previous phases. However, this phase is separated from the existing phase by a strong hedgerow and this alteration is not considered to undermine the character of the development as a whole. In itself, then, the proposed design and layout is considered to be acceptable.

The loss of the former orchard means that certain existing plots on the new development will now be facing other dwellings at closer proximity. Whilst this is clearly not what they were expecting when they purchased their dwellings, the separation distances in excess of 25m front to front and across a road are considered to be appropriate and would not have an adverse impact upon the residents of these existing dwellings. Similarly, the relationship to Longforth Farm is considered to be appropriate in terms of amenity.

Biodiversity

Your biodiversity officer and the County Ecologist have previously raised concerns regarding the loss of the traditional orchard habitat. This is because orchards are a Biodiversity Action Plan (BAP) priority habitat where there is a presumption that they should be preserved. Whilst this is the case as a matter of principle, the current ecological value of the orchard is low. Some of the existing deadwood which provides habitat for invertebrates can be translocated to the newly proposed orchard within the public open space alongside 11 trees that are still living and this will result in limited ecological impact overall.

If the orchard were retained as originally proposed, then it would have been the main area of open space for the development with the children's play area situated within it. It is likely that the intensity of use would have been higher than is likely in the proposed new orchard area and, therefore, the proposed new habitat for invertebrates may well be of greater value than the existing if it were to coexist alongside highly used public open space.

The proposals will result in fewer breaks in the hedgerow bordering the southern part of this part of this land ensuring better continuity of hedgerows for foraging bats. Retaining the orchard would also result in the habitat becoming isolated from the wider area, whereas the proposal to create a new orchard alongside the attenuation ponds on the development and physically connected to the open countryside is likely to be more beneficial. In this regard, there are some ecological benefits of the proposal when compared to those described in the outline permission.

With this in mind, the Biodiversity Officer and County Ecologist have confirmed that they are content with the ecological impact of the proposals and that the loss of the orchard would not warrant refusal of the application.

Heritage assets

The outline proposals, masterplan and design code sought to retain the traditional orchard. The orchard is considered to be a non-designated heritage asset in its own right, being part of the former traditional farmstead at Longforth Farm and also part of the setting of the Grade II listed Longforth Farm, which adjoins it (outside the application site) to the east. The development in the form now proposed will result in the total loss of the non-designated heritage asset and will cause harm to the setting of Longforth Farm. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that special regard is paid to the desirability of preserving the listed building, its setting and any features of historic or architectural interest when deciding whether to grant planning permission.

In terms of the orchard itself, then, the National Planning Policy Framework advises that "the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset" (paragraph 135). The orchard is not currently in good condition and a number of trees have been lost or are in a perilous state. It is not considered that the value of the heritage asset itself is that great, the more important issue being its contribution to the setting of Longforth Farm.

As a consequence of the residential development and development of the factories to the east, Longforth Farm was always going to be surrounded by residential development. In the former proposals, the orchard would have given the farmhouse more breathing space and would have retained one of the last vestiges of its former function. The harm to the setting is, therefore, significant but given that the farmhouse has long been intended to be surrounded by the new residential development and accessed from the estate roads this harm is reduced. It must also be remembered that in the original proposals, the orchard would not have been retained as a 'pure' orchard but as an intensively used area of public open space

including formal children's play facilities. It is, therefore considered that the harm overall would be less than substantial. Paragraph 134 of the NPPF indicates 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 securing its optimum viable use".

As detailed above, the proposal could be considered to have ecological benefit by retaining a greater length of hedgerow than suggested in the original proposals and by re-providing the orchard habitat close to other good wildlife habitat rather than it being isolated within the development. As described above, the applicant has set out a number of other benefits including reducing the need for ground raising and increasing the distance of proposed dwellings from the railway line. It has also been suggested that given the constraints posed by the railway noise, it is likely that retaining the orchard would likely result in around fewer dwellings being delivered on the site. Your officers suspect that the applicant has overstated the likely reduction in dwellings, but in any case, it is likely that the retention of the orchard would result in fewer dwellings. It is considered that maximising the market and affordable housing yield from the site is a benefit that weighs in favour of the application. These matters are considered to weigh in favour of granting planning permission and outweigh the harm caused to the setting of Longforth Farm.

Conclusion

Whilst the proposal results in a significant deviation from the masterplan, the proposal in themselves are considered to be acceptable and will create an appropriate residential development. Whilst the proposal would lead to the loss of the traditional orchard (a non-designated heritage asset) and harm to the setting of the grade II listed Longforth Farmhouse, this harm would be less than substantial. When weighed against the benefits of the proposal compared to the original proposals, in particular the housing yield of the site, it is considered that the benefits outweigh the harm. The proposal would not create unacceptable impacts on existing residential property.

It is, therefore, considered that the proposal are acceptable and it is recommended that reserved matters are approved.

In preparing this report the planning officer has considered fully the implications and requirements of the Human Rights Act 1998.

Contact Officer: Mr M Bale