

DELEGATED DECISION OFFICER REPORT

AUTHORISATION	INITIALS	DATE
Case officer recommendation:	MP	01/12/23
Planning Manager / Team Leader authorisation:	ML	01/12/2023
Planning Technician final checks and despatch:	ER	01/12/2023

Application: 23/01434/FUL **Town / Parish:** Great Bromley Parish Council

Applicant: Mr J Connor - Inova (UK) Ltd

Address: Newhouse Farm Hall Road Great Bromley

Development: Conversion, alteration and extension of existing barns and cottages to form 5 dwellings, including alterations to existing vehicular access and frontage wall.

1. Town / Parish Council

Great Bromley Parish Council No comments received.

2. Consultation Responses

Essex County Council Ecology
15.11.2023 Thank you for consulting Place Services on the above application.

Holding objection due to insufficient ecological information on European Protected Species (bats and Great Crested Newt).

Summary

We have reviewed the Phase 1 Habitat Survey (Richard Kilshaw, March 2020) relating to the likely impacts of development on Designated Sites, protected species and Priority species habitats.

We are not satisfied that there is sufficient ecological information available for determination. This is because the Phase 1 Habitat Survey (Richard Kilshaw, March 2020) is out of date to support this application, in line with CIEEM Guidance¹ and paragraph 6.2.1 of British Standard (BS) BS42020 'Biodiversity - Code of practice for planning and development 2013'. This is because the initial site walkover was undertaken on 4th March 2020.

As a result, we recommend that the applicant's ecologist provides an updated ecological report to support this application, which should require an additional site visit and may require updated desk study information. The ecologist will be required to provide appropriate justification, on:

- The validity of the initial report;
- Which, if any, of the surveys need to be updated; and
- The appropriate scope, timing and methods for the update survey(s).

If additional impacts to protected species are identified as a result of the additional ecological assessment, then any necessary further surveys for protected species should also be provided prior to determination, unless an exceptional circumstance is demonstrated (as defined by BS42020). This is necessary as the Government Circular 06/2005 identifies that the presence of a protected species is a material consideration when a planning authority is considering a

development proposal that, if carried out, would be likely to result in harm to the species or its habitat. Therefore, it is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed application, is established before planning permission is granted.

It is highlighted that within the Phase 1 Habitat Survey (Richard Kilshaw, March 2020) that numerous buildings on site had potential for roosting bats, with one roost confirmed as present and further surveys recommended. However, level of bat roost potential for all buildings are not clearly stated within the report. Therefore, the bat roost potential of all buildings, along with any further presence / likely absence surveys as recommended, and mitigation for roosting bats, should be undertaken by a suitably qualified ecologist submitted and result of submitted prior to determination. This is to ensure the LPA has certainty of the likely impacts to these European Protected Species.

It is also noted that further surveys to identify the presence / likely absence of Great Crested Newts should be undertaken as two ditches holding standing water were identified onsite. The site also lays within an Amber Risk Zone for the Great Crested Newt (GCN) District Level Licensing (GCN Risk Zones (Essex) | Natural England Open Data Geoportal (arcgis.com)) and suitable habitats are present in close proximity to the site. Therefore, to ensure the LPA has certainty of the likely impacts to Great Crested Newts, this information should be submitted prior to determination.

To fully assess the impacts of the proposal the LPA need ecological information for the site, particularly for bats and Great Crested Newts (GCN), both European Protected Species. These surveys are required prior to determination because Government Standing Advice indicates that you should "Survey for great crested newts if there's a pond within 500 metres of the development, even if it only holds water some of the year" and "Survey for bats if the area includes buildings or other structures that bats tend to use or there are trees with features that bats tend to use nearby".

The applicant may be interested to know that Natural England's District Level Licensing for GCN is now available in Essex- see <https://www.gov.uk/government/publications/great-crested-newts-district-level-licensing-schemes> - where sites can be registered to be covered by this strategic mitigation scheme. Guidance for developers and registration forms to join the scheme are available and the LPA will need an Impact Assessment and Conservation Payment Certificate (IACPC) document countersigned by Natural England as evidence of site registration prior to determination where this European Protected Species is likely to be present and affected by development.

The site falls within the evidenced recreational Zone of Influence (ZOI) of Essex Coast RAMs. Therefore, given the residential element of this development is relevant, we note that the LPA has prepared a project level HRA Appropriate Assessment to secure a per dwelling tariff by a legal agreement for delivery of visitor management measures at the designated sites. This will mitigate for predicted recreational impacts in combination with other plans and projects and avoid Adverse Effect on Integrity of the designated Habitats sites.

Essex County Council
Heritage
08.11.2023

Therefore, this further information is required to provide the LPA with certainty of impacts on protected and priority species and enable it to demonstrate compliance with its statutory duties, as well as its biodiversity duty under s.40 NERC Act 2006.

We look forward to working with the LPA and the applicant to receive the additional information required to overcome our holding objection.

The proposal site is a complex of agricultural buildings previously associated with Grade II Listed Great Bromley House (previously known as Newhouse Farm) and includes a 18th Century Grade II Listed Barn and attached cartlodge. The other buildings within the complex are considered to be curtilage listed:

- o Two late 18th-early 19th Century workers cottages;
- o a 17th century 4-bay timber-framed stable barn;
- o a 19th-20th Century shelter shed which was mostly rebuilt on the footprint of a pre-existing building;
- o a 19th - 20th Century workshop.

The farmyard complex is currently in state of disrepair and, while generally structurally sound, requires a number of repair and intervention to secure it from further decay.

A site visit has been carried out within the previous pre-application process in order to assess the impact of the proposal on the significance of Newhouse Farm Hall as designated heritage asset and on the setting of Grade II Listed Great Bromley House.

The conversion of the historic farmyard buildings into residential would result in a degree of less than substantial harm to the significance of the identified heritage asset due to the loss of its original use. It should however be noted that, while the optimum viable use for this complex of building would be their original agricultural use, the farm ceased to operate actively many years ago and the existing buildings would anyway not be suitable for the modern agricultural systems. It is understood from the submitted documents that the applicant has considered possible alternative uses, including commercial, and the property has been on the market for at least 12 months without attracting possible investors. The residential use can be therefore considered the most viable use at this stage and the proposal would result in heritage benefits due to a programme of sympathetic repairs which would prevent further damage to the heritage assets and the loss of irreplaceable historic fabric. There is therefore no objection to the principle of development.

Essex Barn (Grade II Listed)

The proposed scheme is similar to the proposal assessed at pre-application stage. The proposed development would largely retain the existing original structure, with limited new openings and partitioning. The retention of a large portion of the ground floor as open space and of a central full height section ensures that the significance of the listed building as a traditional Essex barn could still be experienced, appreciated and understood.

The central staircase appears very residential in character and its design could be improved to be more in keeping with the rural character of the building. Details of the staircase and landing

structure, including balustrade, should be submitted for approval before construction.

Workers Cottages

The existing cottages are currently in very poor condition. At the time of inspection, only one of the cottages were partially accessible due to safety concerns. While some of the alterations to allow for joining the two cottages into a single dwelling would result in less than substantial harm and the loss of some historic fabric, the conversion would allow for putting the building into use and prevent them for further damage.

It is noted that bi-folding doors are very residential in character and would not be considered in keeping with the rural character of the building and of the setting of Great Bromley House. More traditional French doors would be considered more appropriate in this location.

The use of rooflights should also be limited to provide natural light and ventilation where this is not achievable with traditional windows. I advise the number of rooflight facing Great Bromley House is reduced and conservation rooflights are used in order to minimise their visual impact.

Stable Barn

Similarly, to the Essex Barn, the proposed layout is very similar to the proposal assessed at pre-application stage and is overall considered to preserve the special interest of the heritage asset. The removal of the existing external cement render and the reinstatement of the timber cladding would contribute to enhance the significance of the barn and the setting of Grade II Listed farmhouse.

As advised for the worker cottages, the use of more traditional French doors instead of the proposed bi-folding doors should be avoided and conservation rooflights should be specified.

Shelter and Brick Workshop

There is no objection to the proposed alterations, demolitions and extension.

Proposed repair and details

The proposed wall, roof and floor details are considered acceptable and provide sufficient information in terms of proposed insulation and external finishes. A detailed schedule of repairs to the historic timber structure should however be submitted for approval by the Local Planning Authority prior commencement of any work. Specifications of proposed roof tiles and slates would also be required.

It is noted that condition of existing foundation would require additional investigation and could only be assessed once opening up works will commence on site. Should any repair or structural work be required to the existing foundation, a schedule of proposed works and structural detail should be submitted for approval by the Local Planning Authority.

Landscape layout

There are concerns regarding the proposed relocation of the existing brick boundary wall, which marks the historic boundary to the farmstead, to improve the access and visibility splay. The proposal would result in less than substantial harm, making Paragraph 202 of the NPPF. As such the local planning authority should weigh this harm against any public benefits of the proposal including, where appropriate, securing its optimum viable use. Whilst the scale of harm may be at the lower end of 'less than substantial' great weight should be given to the heritage asset's conservation (Paragraph 199) and clear and convincing justification provided for any level of harm (Paragraph 200).

Additional information would be required regarding the proposed hardstanding material and the existing and proposed boundary between dwellings. Brick boundary walls and close boarded fences are generally considered very residential in character and are likely to affect the open and rural character of the historic farmyard. It is noted that some brick walls are already existing on site and these could be retained or replaced with similar type of boundary.

Timber fences should be of rural character and in keeping with the local character.

Building Recording

The proposal would result in alterations to the original historic buildings and the loss of some historic fabric through repairs and partial demolitions. Prior commencement of any work, a Level 3 building recording should be carried out and submitted for approval by the Local Planning Authority.

UU Open Spaces
15.11.2023

Public Realm Assessment

Play Space - current deficit:

- Deficit of 0.88 hectares of equipped play in Great Bromley

Formal Play - current deficit:

- Deficit of 0.27 hectares of Open Space in Great Bromley

Settlement provision:

- Leap and Open Space provided at Hare Green located 1.9 miles away

Officer Conclusions and Recommendations

Contribution necessary, related, and reasonable?
to comply with CIL Regs*

- No contribution is being requested on this occasion, the provision is adequate to cope with some development
- Should the development increase in size a contribution maybe required.

Identified project*:

(In consultation with Town / Parish Council on upcoming projects or needs for maintenance)

- None on this occasion

From a highway and transportation perspective the impact of the proposal is NOT acceptable to the Highway Authority for the following reasons:

The Highway Authority will protect the principal use of the highway as a right of free and safe passage of all highway users.

The applicant has failed to demonstrate adequate visibility splays from the proposed new access in accordance with the speed of the road, to the satisfaction of the Highway Authority. The lack of such visibility would result in an unacceptable degree of hazard to all highway user to the detriment of highway safety.

The existence of an access in this location is a matter of fact and therefore some degree of conflict and interference to the passage of through vehicles already occurs but the intensification of that conflict and interference which this proposal would engender would lead to a deterioration in the efficiency of the through road as a traffic carrier to the detriment of highway safety.

The proposal is therefore contrary to policy DM1, DM3 and DM7 contained within the County Highway Authority's Development Management Policies, adopted as County Council Supplementary Guidance in February 2011.

Informative:

1. The proposal would lead to the creation of a new vehicular access. As far as can be determined from the submitted plans, the proposed new access has not been provided with the required vehicular visibility splays which must be over land in the applicant's control and/or highway land and measured from and along the nearside edge of the carriageway. The lack of such visibility would result in an unacceptable degree of hazard to all road users to the detriment of highway safety as stated in the recommendation above.

2. The proposed vehicular access is located on the B1029 Hall Road (secondary distributor in the County's Route Hierarchy). It is located within a derestricted speed limit of 60mph. Drawing no. PA_03 B highlights a visibility splay of only 2.4m x 61m to the right and 2.4m x 60m to the left. It is possible that vehicles would be slowing on the approach to the site, however there is no supporting information to determine this.

3. The Highway Authority may reconsider a revised proposal, where appropriate visibility is provided on both approaches for the measured 85th percentile vehicle speeds, taken from the proposed vehicular access location:

i. Speed surveys must be carried out in accordance with "CA 185 Vehicle Speed Measurement on All Purpose Roads". (A suitably qualified service provider with properly calibrated vehicle speed measuring equipment must carry out the survey.)

ii. The outcome of the speed survey would determine whether Design Manual for Roads and Bridges Standard (DMRB) Standard would apply.

iii. A Highway Boundary Plan should be obtained from ECC Highway Records to establish the line of the highway boundary to the front of

the development site splay distance in both directions as measured from and along the nearside edge of the carriageway to establish whether or not the appropriate visibility splays can be achieved over land in the applicant's control and/or highway land. Email address Highway.Status@essexhighways.org

- iv. A Site Access as Proposed Layout Plan, shall be provided, (including the extent of highway should be coloured on the drawing) which shows the appropriate clear to ground visibility splays in both directions with a minor or "X" distance of 2.4 metres by "Y" distance:
- a. "Y" distance appropriate for vehicle speeds travelling along Hall Road on the approach to the proposed access (vehicles approaching from the north-west) as determined from the outcome of the speed survey for the measured 85th percentile speeds.
 - b. "Y" distance appropriate for vehicles travelling along Hall Road on the non-approach to the proposed access (vehicles approaching from the south-east).
 - c. The location points of the speed measurement must be shown on a Site Layout Plan and the speed data must be appended.

4. As the proposed new access is on a B road a Stage 1 Road Safety Audit should be provided and swept path analysis drawing for a fire tender and refuge vehicle shall also be provided for the new access.

Clearly if the applicant does commission additional work there is no guarantee that the required standards can be met or that the proposal will be acceptable to the Highway Authority.

Environmental Protection
17.10.2023

With reference to the above application, please see below for comments from the EP Team:

Contaminated Land: I can confirm we have reviewed the submitted Phase One Desk Top Study report, dated August 2020, and are satisfied with its contents and methodology. However, the report concludes that further sampling of spoil mounds located on the site are required, along with soil gas monitoring. Therefore the EP Team are requesting a further Phase 2 risk assessment be performed in accordance with the recommendations, and submitted to the LPA for approval prior to the commencement of any works taking place on site. We would also request confirmation of the presence, or lack of asbestos on the site.

REASON: to ensure that any risks (to future users of the land and neighbouring land and to controlled waters, property and ecological systems) arising from any land contamination are minimised and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

Construction Method Statement: In order to minimise potential nuisance to nearby existing residents caused by construction and demolition works, Environmental Protection ask that the following is submitted, on any further subsequent planning phase:

Prior to the commencement of any construction or demolition works, the applicant (or their contractors) shall submit a full method statement to, and receive written approval from, the Pollution and Environmental Control. This should at minimum include the following where applicable.

o Noise Control

1) The use of barriers to mitigate the impact of noisy operations will be used where possible. This may include the retention of part(s) of

the original buildings during the demolition process to act in this capacity.

2) No vehicle connected with the works to arrive on site before 07:30 or leave after 19:00(except in the case of emergency). Working hours to be restricted between 08:00 and 18:00 Monday to Saturday (finishing at 13:00 on Saturday) with no working of any kind permitted on Sundays or any Public/Bank Holidays.

3) The selection and use of machinery to operate on site, and working practices to be adopted will, as a minimum requirement, be compliant with the standards laid out in British Standard 5228.

4) Mobile plant to be resident on site during extended works shall be fitted with non-audible reversing alarms (subject to HSE agreement).

5) Prior to the commencement of any piling works which may be necessary, a full method statement shall be agreed in writing with the Planning Authority (in consultation with Pollution and Environmental Control). This will contain a rationale for the piling method chosen and details of the techniques to be employed which minimise noise and vibration to nearby residents.

6) If there is a requirement to work outside of the recommended hours the applicant or contractor must submit a request in writing for approval by Pollution and Environmental Control prior to the commencement of works.

o Emission Control

1) All waste arising from the demolition process, ground clearance and construction processes to be recycled or removed from the site subject to agreement with the Local Planning Authority and other relevant agencies.

2) No materials produced as a result of the site development or clearance shall be burned on site.

3) All reasonable steps, including damping down site roads, shall be taken to minimise dust and litter emissions from the site whilst works of construction and demolition are in progress.

4) All bulk carrying vehicles accessing the site shall be suitably sheeted to prevent nuisance from dust in transit.

Adherence to the above condition will significantly reduce the likelihood of public complaint and potential enforcement action by Pollution and Environmental Control. The condition gives the best practice for Demolition and Construction sites. Failure to follow them may result in enforcement action under nuisance legislation (Environmental Protection Act 1990), or the imposition of controls on working hours (Control of Pollution Act 1974).

REASON: to protect the amenity of nearby residential dwellings

INFORMATIVE -

Foul Drainage: The submitted application form states the method for foul waste disposal will be in the form of a Sewerage Treatment Plant; we would request, should the application be approved, that the Applicant / Agent, ensure the installation is fully compliant with the Environment Agency's Binding Rules and any other relevant Government guidance and British standards, in respect of these systems. Information on this can be found at: Septic tanks and treatment plants: permits and general binding rules: The general binding rules - GOV.UK (www.gov.uk). It is strongly recommended these rules are complied with, as they will minimise any potential nuisance to nearby residential dwellings, assist in preventing a potential Public Health nuisance, and minimise the potential for adverse incidents, of which may result in formal enforcement action.

REASON: to protect the health of residents and nearby residential premises

Essex County Council
Archaeology
07.11.2023

Should you have any queries concerning this, please do not hesitate to contact me.

The above planning application is for the Conversion, alteration and extension of existing barns and cottages to form 5 dwellings, including alterations to existing vehicular access and frontage wall.

The buildings proposed for conversion and alteration form part of a historic farmstead associated with Great Bromley House (formerly known as Newhouse Farmhouse), a Grade II listed building and include a Grade II listed barn and cartlodge. A Heritage Statement and Impact Assessment has been submitted with the application which provides a good account of the buildings and places them in their historical context. The Stable barn, attached to the workers cottages, has been identified as being of possible 17th century date that was later altered with the core of the farmstead dating to the late 18th century. There is good survival of the historic fabric, fixtures and fittings, including original floors of both barns.

Recent work published in the East Anglian Archaeology: Research and Archaeology: A Framework for the Eastern Counties 2. Research Agenda and Strategy states that the East Anglian Farmstead (1750-1914) are a crucial, but understudied component of the East Anglian Landscape. The area was of major international importance in the development of the 'Victorian High Farming tradition' when new ideas culminated in significant alterations in the design and layouts of buildings. The conversion and alterations to the farm buildings may impact on surviving historic fabric and features and result in the loss of the original function and significance of the buildings.

NPPF paragraph 205 requires developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. In accordance with paragraph 205 of the NPPF it is therefore important that a Level 3 historic building record is made before demolition takes place.

The following conditions are recommended in line with the National Planning Policy Framework:

1. No demolition or development of any kind shall take place until the applicant has secured the implementation of a programme of historic building recording in accordance with a written scheme of investigation which has been submitted by the applicant, and approved by the planning authority.
2. The applicant will submit a historic buildings report which has been submitted and approved by the local planning authority and deposition of a digital archive with the Archaeological Data Service (ADS).

A professional historic building specialist should undertake any fieldwork. A brief detailing the requirements can be produced from this office. The District Council should inform the applicant of the recommendation and its financial implications.

NOTE: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.

3. Planning History

01/00902/OUT	New farm bungalow to be used as dwelling, farm office and facilities	Refused	06.09.2001
19/00364/AGRIC	Proposed single storey pitched roof building.	Determination	03.04.2019
19/00879/AGRIC	Proposed single storey pitched roof building.	Determination	03.07.2019
19/01880/COUNOT	Proposed change of use of 5 former agricultural buildings to residential dwellings accessed via the existing former farm access drive to the rear of New House Farm buildings.	Prior Approval not required	29.01.2020
20/01070/FUL	Proposed two storey and single storey extensions and alterations.	Approved	30.10.2020
21/01382/DISCON	Discharge of condition 2 (Materials Schedule) of application 19/01880/COUNOT.	Approved	02.09.2021
23/00168/FULHH	Demolition of precast concrete single garage and construction of new brick double garage.	Approved	27.06.2023
23/01481/LBC	Alterations and extensions to facilitate the conversion of existing barn into residential use, including alterations to frontage wall.	Current	

4. Relevant Policies / Government Guidance

National:

National Planning Policy Framework July 2023 (NPPF)

National Planning Practice Guidance (NPPG)

Local Planning Guidance

Local:

Tendring District Local Plan 2013-2033 and Beyond North Essex Authorities' Shared Strategic Section 1 Plan (adopted January 2021)

SP1 Presumption in Favour of Sustainable Development

SP2 Recreational disturbance Avoidance and Mitigation Strategy (RAMS)

SP3 Spatial Strategy for North Essex

SP4 Meeting Housing Needs

SP7 Place Shaping Principles

Tendring District Local Plan 2013-2033 and Beyond Section 2 (adopted January 2022)

SPL1 Managing Growth

SPL2 Settlement Development Boundaries

SPL3 Sustainable Design

HP5 Open Space, Sports and Recreation Facilities
LP1 Housing Supply
LP2 Housing Choice
LP3 Housing Density and Standards
LP4 Housing Layout
PPL3 The Rural Landscape
PPL4 Biodiversity and Geodiversity
PPL5 Water Conservation, Drainage and Sewerage
PPL9 Listed Buildings
PPL10 Renewable Energy Generation
CP1 Sustainable Transport and Accessibility
CP2 Improving the Transport Network
DI1 Infrastructure delivery and impact mitigation

Local Planning Guidance
Essex County Council Car Parking Standards - Design and Good Practice
Essex Design Guide
Enabling Development and the Conservation of Significant Places (2008)

Status of the Local Plan

Planning law requires that decisions on applications must be taken in accordance with the development plan unless there are material considerations that indicate otherwise (Section 70(2) of the 1990 Town and Country Planning Act and Section 38(6) of the Planning and Compulsory Purchase Act 2004). This is set out in Paragraph 2 of the National Planning Policy Framework (the Framework). The 'development plan' for Tendring comprises, in part, Sections 1 and 2 of the Tendring District Council 2013-33 and Beyond Local Plan (adopted January 2021 and January 2022, respectively), supported by our suite of evidence base core documents (<https://www.tendringdc.uk/content/evidence-base>) together with any neighbourhood plans that have been brought into force.

In relation to housing supply:

The Framework requires Councils boost significantly the supply of housing to meet objectively assessed future housing needs in full. In any one year, Councils must be able to identify five years of deliverable housing land against their projected housing requirements (plus an appropriate buffer to ensure choice and competition in the market for land, to account for any fluctuations in the market or to improve the prospect of achieving the planned supply). If this is not possible or if housing delivery over the previous three years has been substantially below (less than 75%) the housing requirement, Paragraph 11 d) of the Framework requires granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole (what is often termed the 'tilted balance').

The Local Plan fixes the Council's housing requirement at 550 dwellings per annum. On 19 October 2021 the Council's Strategic Housing Land Availability Assessment (SHLAA) updated the housing land supply position. The SHLAA demonstrates in excess of a six-and-a-half-year supply of deliverable housing land. On 14 January 2022 the Government published the Housing Delivery Test (HDT) 2021 measurement. Against a requirement for 1420 homes for 2018-2021, the total number of homes delivered was 2345. The Council's HDT 2021 measurement was therefore 165%. As a result, the 'tilted balance' at paragraph 11 d) of the Framework does not apply to applications for housing.

Neighbourhood Plans

A neighbourhood plan introduced by the Localism Act that can be prepared by the local community and gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan to promote development and uphold the strategic policies as part of the Development Plan alongside the Local Plan. Relevant policies are considered

in the assessment. Further information on our Neighbourhood Plans and their progress can be found via our website <https://www.tendringdc.uk/content/neighbourhood-plans>

5. Officer Appraisal

Site Description

The application site is Newhouse Farm, which is located along the eastern section of Hall Road within the parish of Great Bromley. Newhouse Farm is a complex of agricultural buildings that are associated with the adjacent Grade II Listed Building Great Bromley House (which itself falls outside of the application site). The complex includes a large 18th Century Grade II Listed barn together with four buildings that are regarded as being curtilage listed.

The character of the surrounding area is defined as semi-rural; while the plot itself includes built form and there is other sporadic built form to the south in particular, the wider area includes large parcels of grassed and agricultural land.

The site falls outside of a recognised Settlement Development Boundary within the adopted Local Plan 2013-2033.

Description of Proposal

This application seeks planning permission for the conversion, alteration and extension of the existing barns and cottages to provide for a total of five dwellings. The application also includes alterations to the existing vehicular access by relocating it further south, and alterations to the frontage wall to allow for visibility splays.

A concurrent Listed Building Consent application has been submitted (reference 23/01481/LBC) but has not yet been determined at the time of writing, for alterations and extensions to facilitate the conversion of existing Grade II Listed barn into residential use, and for the alterations to the frontage wall.

Site History

Under planning reference 19/01880/COUNOT, prior approval was granted in January 2020 for the change of use of five former agricultural buildings located to the rear (east) of the current application site into five residential dwellings. At the time of the site visit, Officers note that the permission has since been implemented.

Assessment

1. Principle of development/Heritage Impacts

The application site falls outside of a recognised Settlement Development Boundary within the adopted Local Plan 2013-2033, with the nearest settlement being Great Bromley which lies approximately 1,000 metres to the east of the application site. The proposed development would therefore extend beyond the area planned to provide growth for this settlement and given that the Council can now demonstrate a comfortable five year housing supply it ordinarily does not need to look beyond identified settlements to meet its housing requirement.

However, Paragraph 80 (b and c) of the National Planning Policy Framework (NPPF) (2023) confirms that planning policies and decisions should avoid the development of isolated homes in the countryside unless either the development would represent the optimal viable use of a heritage asset or would re-use redundant or disused buildings and enhance its immediate setting.

Given the above, Essex County Council Place Services (Heritage) have been consulted. They have provided the following comments:

“The proposal site is a complex of agricultural buildings previously associated with Grade II Listed Great Bromley House (previously known as Newhouse Farm), and includes a 18th Century Grade II

Listed Barn and attached cartlodge. The other buildings within the complex are considered to be curtilage listed:

- o Two late 18th-early 19th Century workers cottages;*
- o a 17th century 4-bay timber-framed stable barn;*
- o a 19th-20th Century shelter shed which was mostly rebuilt on the footprint of a pre-existing building;*
- o a 19th - 20th Century workshop.*

The farmyard complex is currently in state of disrepair and, while generally structurally sound, requires a number of repair and intervention to secure it from further decay.

A site visit has been carried out within the previous pre-application process in order to assess the impact of the proposal on the significance of Newhouse Farm Hall as a designated heritage asset and on the setting of Grade II Listed Great Bromley House.

The conversion of the historic farmyard buildings into residential would result in a degree of less than substantial harm to the significance of the identified heritage asset due to the loss of its original use. It should however be noted that, while the optimum viable use for this complex of building would be their original agricultural use, the farm ceased to operate actively many years ago and the existing buildings would anyway not be suitable for the modern agricultural systems. It is understood from the submitted documents that the applicant has considered possible alternative uses, including commercial, and the property has been on the market for at least 12 months without attracting possible investors. The residential use can be therefore considered the most viable use at this stage and the proposal would result in heritage benefits due to a programme of sympathetic repairs which would prevent further damage to the heritage assets and the loss of irreplaceable historic fabric. There is therefore no objection to the principle of development.

Essex Barn (Grade II Listed):

The proposed scheme is similar to the proposal assessed at pre-application stage. The proposed development would largely retain the existing original structure, with limited new openings and partitioning. The retention of a large portion of the ground floor as open space and of a central full height section ensures that the significance of the listed building as a traditional Essex barn could still be experienced, appreciated and understood.

The central staircase appears very residential in character and its design could be improved to be more in keeping with the rural character of the building. Details of the staircase and landing structure, including balustrade, should be submitted for approval before construction.

Workers Cottages:

The existing cottages are currently in very poor condition. At the time of inspection, only one of the cottages were partially accessible due to safety concerns. While some of the alterations to allow for joining the two cottages into a single dwelling would result in less than substantial harm and the loss of some historic fabric, the conversion would allow for putting the building into use and prevent them for further damage.

It is noted that bi-folding doors are very residential in character and would not be considered in keeping with the rural character of the building and of the setting of Great Bromley House. More traditional French doors would be considered more appropriate in this location.

The use of rooflights should also be limited to provide natural light and ventilation where this is not achievable with traditional windows. I advise the number of rooflight facing Great Bromley House is reduced and conservation rooflights are used in order to minimise their visual impact.

Stable Barn:

Similarly to the Essex Barn, the proposed layout is very similar to the proposal assessed at pre-application stage and is overall considered to preserve the special interest of the heritage asset. The

removal of the existing external cement render and the reinstatement of the timber cladding would contribute to and enhance the significance of the barn and the setting of Grade II Listed farmhouse.

As advised for the worker cottages, the use of more traditional French doors instead of the proposed bi-folding doors should be avoided and conservation rooflights should be specified.

Shelter and Brick Workshop:

There is no objection to the proposed alterations, demolitions and extension.

Proposed repair and details:

The proposed wall, roof and floor details are considered acceptable and provide sufficient information in terms of proposed insulation and external finishes. A detailed schedule of repairs to the historic timber structure should however be submitted for approval by the Local Planning Authority prior commencement of any work. Specifications of proposed roof tiles and slates would also be required.

It is noted that the condition of existing foundation would require additional investigation and could only be assessed once opening up works will commence on site. Should any repair or structural work be required to the existing foundation, a schedule of proposed works and structural detail should be submitted for approval by the Local Planning Authority.

Landscape layout:

There are concerns regarding the proposed relocation of the existing brick boundary wall, which marks the historic boundary to the farmstead, to improve the access and visibility splay. The proposal would result in less than substantial harm, making Paragraph 202 of the NPPF. As such the local planning authority should weigh this harm against any public benefits of the proposal including, where appropriate, securing its optimum viable use. Whilst the scale of harm may be at the lower end of 'less than substantial' great weight should be given to the heritage asset's conservation (Paragraph 199) and clear and convincing justification provided for any level of harm (Paragraph 200).

Additional information would be required regarding the proposed hardstanding material and the existing and proposed boundary between dwellings. Brick boundary walls and close boarded fences are generally considered very residential in character and are likely to affect the open and rural character of the historic farmyard. It is noted that some brick walls are already existing on site and these could be retained or replaced with similar type of boundary.

Timber fences should be of rural character and in keeping with the local character.

Building Recording:

The proposal would result in alterations to the original historic buildings and the loss of some historic fabric through repairs and partial demolitions. Prior commencement of any work, a Level 3 building recording should be carried out and submitted for approval by the Local Planning Authority."

Therefore, in summary ECC (Heritage) have confirmed that the change of use is acceptable in principle, and that residential use represents an optimum viable use for the site that would also result in heritage benefits due to a programme of sympathetic repairs which would prevent further damage to the heritage assets and the loss of irreplaceable historic fabric. A level of less than substantial harm has been identified, however on this occasion Officers consider that the wider proposal to re-use redundant and disused buildings generates a level of public benefit that would outweigh the identified harm. That notwithstanding, additional details would be recommended to be secured via planning conditions had the application ultimately been recommended for approval.

Taking all of the above into consideration, while the site is outside of an area where the Council would typically wish to direct development towards and a level of less than substantial harm has been identified, the proposal would see important buildings retained in an alternative viable use,

making best use of the building and allowing investment to it, and therefore Officers, on balance, support the principle of development subject to the more technical matters discussed below.

2. Design, Layout and Appearance

Paragraph 130 of the National Planning Policy Framework (NPPF) (2023) requires that developments are visually attractive as a result of good architecture, are sympathetic to local character, and establish or maintain a strong sense of place.

Adopted Policy SP7 of the 2013-33 Local Plan seeks high standards of urban and architectural design, which responds positively to local character and context. Adopted Policy SPL3 Part A (b) requires that development relates well to its site and surroundings, particularly in relation to its siting, height, scale, massing, form, design and materials.

The application site is partly prominent from views along Hall Road to the west, although some of the buildings are sited within the site and are therefore less prominent. The current site is in a poor state of repair and in need of restoration. Whilst the works involved will alter the visual appearance of the site, they are largely not significant changes and typically involve alterations such as additional doors/windows as would be expected, and overall will retain the character of the existing built form.

Adopted Policy LP4(j) states there should be provision for private amenity space of a size and configuration that meets the needs and expectations of residents, and which is commensurate to the size of dwelling and the character of the area.

The submitted plans show that the properties will be served by the following bedrooms:

- 1 x 2 bedrooms;
- 2 x 3 bedrooms;
- 1 x 4 bedrooms; and
- 1 x 5 bedrooms.

The submitted plans indicate different levels of private amenity space for each of the five plots, of which Officers are content meets the requirements of Policy LP4.

Furthermore, Policy LP3(b) states new residential development must comply with the government's latest 'Technical housing standards - nationally described space standard', which for the proposals submitted require a range between 61 square metres and 110 square metres. All of the properties comfortably exceed these requirements, and therefore no objection is raised in this regard.

3. Impact to Neighbouring Amenities

Paragraph 130 of the National Planning Policy Framework (2021) confirms planning policies and decisions should create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users.

Policy SP7 of Section 1 of the 2013-33 Local Plan requires that the amenity of existing and future residents is protected. Section 2 Policy SPL 3 (Part C) seeks to ensure that development will not have a materially damaging impact on the privacy, daylight or other amenities of occupiers of nearby properties.

The nearest residential properties are Great Bromley House to the north-west, Newhouse Farm Cottages to the south-east, and the five dwellings subject of 19/01880/COUNOT to the east. While the proposed conversions would be visible to the occupants of these properties, it is noted that the buildings are already in situ. Given this, that there is good separation distances between the properties, and that there are no significant overlooking concerns, Officers consider the impact to neighbouring amenities is to an acceptable level.

In addition, it is noted that the vehicular movements (and therefore noise) associated with five dwellings will be an increase to the existing baseline position. However, given the current use would likely lead to a degree of vehicular movements, and that the movements associated with five

dwelling would not be significant, Officers do not consider the harm to be such that it would warrant recommending a reason for refusal.

4. Highway Safety

Paragraph 108 of the National Planning Policy Framework 2023 seeks to ensure that safe and suitable access to a development site can be achieved for all users. Paragraph 111 of the Framework states that Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

Policy SPL3 (Part B) of the Adopted Local Plan seeks to ensure that access to a new development site is practicable and the highway network will be able to safely accommodate the additional traffic the proposal will generate and provision is made for adequate vehicle and cycle parking.

Adopted Policy CP1 (Sustainable Transport and Accessibility) states proposals for new development must be sustainable in terms of transport and accessibility and therefore should include and encourage opportunities for access to sustainable modes of transport, including walking, cycling and public transport.

ECC Highways, upon consultation, have confirmed that from a highway and transportation perspective, the impact of the proposal is not acceptable on the grounds that the submission has failed to demonstrate adequate visibility splays from the proposed new access in accordance with the speed of the road can be achieved on land within the applicant's ownership. Whilst the current existence of an access in this location is a matter of fact and therefore there is some degree of conflict and interference to the passage of through vehicles currently, the intensification of that conflict and interference which this proposal would generate is to the detriment of highway safety.

It has therefore not been successfully demonstrated that the proposed development could be implemented without causing an unacceptable degree of hazard to all highway users, to the detriment of highway safety.

Officers have requested the above information be provided to the agent for the application, however this has not been forthcoming at the time of writing.

Furthermore, Essex Parking Standards (2009) state that for dwellings with two bedrooms or more there should be a minimum of two parking spaces measuring 5.5m x 2.9m. The proposal allows for a total of 12 parking spaces within the site, and therefore meets the above requirements.

5. Impact on Protected Species

Paragraph 174 of the Framework states planning decisions should contribute to and enhance the natural and local environment, by minimising impacts and providing net gains for biodiversity. Paragraph 180(a) of the NPPF confirms that in assessing planning applications where significant harm to biodiversity as a result of a development cannot be avoided, adequately mitigated or, as a last resort, compensated for, then planning permission should be refused.

Adopted Policy SP7 requires that all new development should incorporate biodiversity creation and enhancement measures. Adopted Policy SPL3 Part A(d) includes that the design and layout of development should maintain or enhance ecological value.

ECC Place Services (Ecology), upon consultation, have confirmed that they raise a holding objection on the grounds that insufficient ecological information has been submitted in support of this application, with the submitted Phase 1 Habitat Survey being out of date. To fully assess the impacts of the proposal the applicant should provide an updated ecological assessment to provide an adequate assessment of the proposal and to ascertain if there is a need for further, more detailed, surveys and/or mitigation measures.

Following these comments, a request was made by Officers to the agent for the application for the submission of updated ecological information, however this has not been forthcoming. The submission, therefore, has failed to demonstrate that the development can be implemented without causing significant harm to protected species.

6. Contamination

The Council's Environmental Protection team have been consulted and have confirmed that following a review of the submitted Phase One Desk Top Study report, dated August 2020, they are satisfied with its contents and methodology. However, given the report concludes that further sampling of spoil mounds located on the site are required, along with soil gas monitoring, they have requested a further Phase 2 Risk Assessment be provided to the Local Planning Authority prior to the commencement of any works taking place on site. Officers note these comments and would have recommended this be included as a planning condition in the event the application was recommended for approval.

7. Foul Drainage

Paragraph 174 of the Framework states that planning policies and decisions should contribute to and enhance the natural and local environment by preventing new development from contributing to unacceptable levels of water pollution. Furthermore, Paragraph 185 of the Framework states that planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects of pollution on the natural environment.

Paragraph: 020 of the National Planning Policy Guidance states that where a connection to a public sewage treatment plant is not feasible a package sewage treatment plant can be considered. The package sewage treatment plant must comply with the Small sewage discharges in England: general binding rules 2015 (GBR), or a permit will be required. Package sewage treatment plants may only be considered if it can be clearly demonstrated by the applicant that discharging into a public sewer is not feasible (taking into account cost and/or practicability and whether the package treatment plant poses a risk to a designated site) in accordance with Approved Document H of the Building Regulations 2010.

Adopted Policy PPL5 of Section 2 of the Adopted Local Plan states that all new development must make adequate provision for drainage and sewerage. Private sewage treatment facilities will not be permitted if there is an accessible public foul sewer. Where private sewage treatment facilities are the only practical option for sewage disposal, they will only be permitted where there would be no harm to the environment, having regard to preventing pollution of groundwater and any watercourses and odour.

In relation to non-mains drainage from non-major development the Environment Agency's advice is that to comply with the Framework and PPG on foul drainage matters, an LPA needs to be satisfied that foul drainage can be provided without adverse impact on the environment. This requires ensuring that both those environmental risks outside of the control of the permit and the relevant considerations in the PPG are addressed. The LPA should also be mindful that the developer will need to address foul drainage matters to get their environmental permit and meet building control regulations. Therefore, they should be confident that it is likely that any necessary permits and approvals can be successfully obtained.

Question 11 of the application form states that it is not intended to connect to a mains sewer. Instead, foul sewage will be disposed of by way of a package treatment plant; the declaration implies that a mains connection is not possible.

In considering the acceptability of the proposed non-mains drainage, while the site is located in close proximity to existing dwellings, it is not close to any designated site of importance to biodiversity, nor is it located within close proximity to any watercourse. The site is not located within a Drinking Water Safeguard Zone or a Source Protection Zone, and the site is sufficiently large enough to accommodate a soakaway. Furthermore, flows from a treatment plant serving five dwellings served would not be to a significant level. Taking all these factors into account, and the absence of a mains

connection in close proximity to the site, the proposed foul drainage arrangements are considered to be acceptable.

8. Renewable Energy

Paragraph 112 of the Framework states that applications for development should be designed to enable charging of plug-in and other ultra-low emission vehicles (ULEV) in safe, accessible and convenient locations. However, recent UK Government announcements that ULEV charging points will become mandatory for new development have yet to be published.

Policies PPL10 and SPL3, together, require consideration be given to renewable energy generation and conservation measures. Proposals for new development of any type should consider the potential for a range of renewable energy generation solutions, appropriate to the building(s), site and its location, and be designed to facilitate the retro-fitting of renewable energy installations.

The proposal includes for a development that has the potential to incorporate renewable energy features. There are no details that accompany the planning application that demonstrate the water, energy and resource efficiency measures that the scheme will incorporate, and a condition requesting details of this would be suggested in the event the application was recommended for approval.

9. Financial Contributions - Open Space and Play Space

Paragraph 54 of the National Planning Policy Framework (2021) states Local Planning Authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Paragraph 56 of the NPPF states planning obligations must only be sought where they are necessary to make the development acceptable in planning terms, directly relate to the development and fairly and reasonably relate in scale and kind to the development.

In line with the requirements of Section 2 Policy HP5 the Council's Open Space Team have been consulted on the application to determine if the proposal would generate the requirement for a financial contribution toward public open or play space. The outcome of the consultation is that there is currently a deficit of 0.88 hectares of equipped play and 0.27 hectares of formal open space in Great Bromley, however no contribution is requested on this occasion.

10. Financial Contribution - Recreational Disturbance

Under the Habitats Regulations, a development which is likely to have a significant effect or an adverse effect (alone or in combination) on a European designated site must provide mitigation or otherwise must satisfy the tests of demonstrating 'no alternatives' and 'reasons of overriding public interest'. There is no precedent for a residential development meeting those tests, which means that all residential development must provide mitigation.

The application scheme proposes a residential on a site that lies within the Zone of Influence (Zoi) being approximately being approximately 6.2 kilometres from the Stour and Orwell Estuaries SPA and Ramsar sites. New housing development within the Zoi would be likely to increase the number of recreational visitors to these sites and in combination with other developments it is likely that the proposal would have significant effects on the designated site. Mitigation measures must therefore be secured prior to occupation.

A completed unilateral undertaking has not been provided to secure this legal obligation. As submitted, there is no certainty that the development would not adversely affect the integrity of European Designated Sites and the application is therefore contrary to Policy PPL4 of the Adopted Tendring District Local Plan 2013-2033 and Regulation 63 of the Conservation of Habitat and Species Regulations 2017.

Other Considerations

Great Bromley Parish Council have not provided any comments.

There have been no other letters of representation received.

Conclusion

The application site falls outside of a recognised Settlement Development Boundary within the adopted Local Plan 2013-2033 and a level of less than substantial harm has been identified, however on this occasion Officers acknowledge the conversion of the buildings would result in the re-use of currently redundant or disused buildings and enhance the immediate setting. Therefore, on balance, the principle of development is accepted in this location. Furthermore, Officers raise no concerns in relation to the impact to neighbouring amenities, parking provision or private amenity allowance.

However, ECC Place Services (Ecology) have issued a holding objection due to insufficient ecological information being provided, and similarly ECC Highway have raised an objection on the basis the submission has failed to provide details of visibility splay plans to demonstrate the minimum required splays can be achieved on land within the applicant's ownership.

Accordingly, the application does not comply with local and national planning policies and is therefore recommended for refusal.

6. Recommendation

Refusal.

7. Reasons for Refusal

- 1 Paragraph 108 of the National Planning Policy Framework 2023 seeks to ensure that safe and suitable access to a development site can be achieved for all users. Paragraph 111 of the Framework states that Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

Policy SPL3 (Part B) of the Adopted Local Plan seeks to ensure that access to a new development site is practicable and the highway network will be able to safely accommodate the additional traffic the proposal will generate, and provision is made for adequate vehicle and cycle parking.

Adopted Policy CP1 (Sustainable Transport and Accessibility) states proposals for new development must be sustainable in terms of transport and accessibility and therefore should include and encourage opportunities for access to sustainable modes of transport, including walking, cycling and public transport.

The submission has failed to demonstrate adequate visibility splays from the proposed new access in accordance with the speed of the road can be achieved on land within the applicant's ownership. Whilst the current existence of an access in this location is a matter of fact and therefore there is some degree of conflict and interference to the passage of through vehicles currently, the intensification of that conflict and interference which this proposal would generate is to the detriment of highway safety.

It has therefore not been successfully demonstrated that the proposed development could be implemented without causing an unacceptable degree of hazard to all highway users, to the detriment of highway safety and contrary to the above local and national planning policies.

- 2 Paragraph 174 of the Framework states planning decisions should contribute to and enhance the natural and local environment, by minimising impacts and providing net gains for biodiversity. Paragraph 180(a) of the NPPF confirms that in assessing planning applications where significant harm to biodiversity as a result of a development cannot be avoided,

adequately mitigated or, as a last resort, compensated for, then planning permission should be refused.

Adopted Policy PPL4 states that proposals for new development should be supported by an appropriate ecological assessment, and where new development would harm biodiversity or geodiversity, planning permission will only be granted in exceptional circumstances, where the benefits of the development demonstrably outweigh the harm caused and where adequate mitigation or, as a last resort, compensation measures are included, to ensure a net gain, in biodiversity.

Adopted Policy SP7 requires that all new development should incorporate biodiversity creation and enhancement measures. Adopted Policy SPL3 Part A(d) includes that the design and layout of development should maintain or enhance ecological value.

The application site has the potential to accommodate protected species. An up to date Preliminary Ecological Appraisal has not been provided, and as such it has not been adequately demonstrated that the development can be implemented without causing harm to protected species, contrary to the above national and local planning policies.

- 3 Under the Habitats Regulations, a development which is likely to have a significant effect or an adverse effect (alone or in combination) on a European designated site must provide mitigation or otherwise must satisfy the tests of demonstrating 'no alternatives' and 'reasons of overriding public interest'. There is no precedent for a residential development meeting those tests, which means that all residential development must provide mitigation.

The application scheme proposes a residential on a site that lies within the Zone of Influence (Zoi) being approximately 6.2 kilometres from the Stour and Orwell Estuaries SPA and Ramsar sites. New housing development within the Zoi would be likely to increase the number of recreational visitors to these sites and in combination with other developments it is likely that the proposal would have significant effects on the designated site. Mitigation measures must therefore be secured prior to occupation.

A completed unilateral undertaking has not been provided to secure this legal obligation. As submitted, there is no certainty that the development would not adversely affect the integrity of European Designated Sites and the application is therefore contrary to Policy PPL4 of the Adopted Tendring District Local Plan 2013-2033 and Regulation 63 of the Conservation of Habitat and Species Regulations 2017.

8. Informatives

Positive and Proactive Statement:

The Local Planning Authority has acted positively and proactively in determining this application by identifying matters of concern with the proposal and discussing those with the Applicant. However, the issues are so fundamental to the proposal that it has not been possible to negotiate a satisfactory way forward and due to the harm, which has been clearly identified within the reason(s) for the refusal, approval has not been possible.

Plans and Supporting Documents:

The Local Planning Authority has resolved to refuse the application for the reason(s) set out above. For clarity, the refusal is based upon the consideration of the plans and supporting documents accompanying the application as follows, (accounting for any updated or amended documents):

Drawing Numbers SK_18, PA_01 Revision A, PA_02 Revision A, PA_03 Revision B, PA_04 Revision AB, PA_10, PA_12, PA_15 Revision A, PA_16 Revision A, PA_17, PA_18 Revision A, PA_19 Revision A, PA_20 Revision A, PA_50 Revision A, PA_51, PA_52, PA_53, PA_54, PA_55 Revision A, and documents titled 'Heritage Assessment and Impact Statement' and 'Phase I Environmental Desk Study'.

9. Equality Impact Assessment

In making this recommendation/decision regard must be had to the public sector equality duty (PSED) under section 149 of the Equality Act 2010 (as amended). This means that the Council must have due regard to the need in discharging its functions that in summary include A) Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act; B. Advance equality of opportunity between people who share a protected characteristic* (See Table) and those who do not; C. Foster good relations between people who share a protected characteristic* and those who do not, including tackling prejudice and promoting understanding.

It is vital to note that the PSED and associated legislation are a significant consideration and material planning consideration in the decision-making process. This is applicable to all planning decisions including prior approvals, outline, full, adverts, listed buildings etc. It does not impose an obligation to achieve the outcomes outlined in Section 149. Section 149 represents just one of several factors to be weighed against other pertinent considerations.

In the present context, it has been carefully evaluated that the recommendation articulated in this report and the consequent decision are not expected to disproportionately affect any protected characteristic* adversely. The PSED has been duly considered and given the necessary regard, as expounded below.

Protected Characteristics *	Analysis	Impact
Age	The proposal put forward will not likely have direct equality impacts on this target group.	Neutral
Disability	The proposal put forward will not likely have direct equality impacts on this target group.	Neutral
Gender Reassignment	The proposal put forward will not likely have direct equality impacts on this target group.	Neutral
Marriage or Civil Partnership	The proposal put forward will not likely have direct equality impacts on this target group.	Neutral
Pregnancy and Maternity	The proposal put forward will not likely have direct equality impacts on this target group.	Neutral
Race (Including colour, nationality and ethnic or national origin)	The proposal put forward will not likely have direct equality impacts on this target group.	Neutral
Sexual Orientation	The proposal put forward will not likely have direct equality impacts on this target group.	Neutral
Sex (gender)	The proposal put forward will not likely have direct equality impacts on this target group.	Neutral
Religion or Belief	The proposal put forward will not likely have direct equality impacts on this target group.	Neutral