

**DELEGATED**

**AGENDA NO  
PLANNING COMMITTEE  
16 APRIL 2014  
REPORT OF CORPORATE DIRECTOR,  
DEVELOPMENT AND NEIGHBOURHOOD  
SERVICES**

**13/3073/FUL**

**Tees Valley Nursery, The Moat, Belasis Hall Technology Park  
Permanent siting of static caravans for seasonal workers**

**Expiry Date 3 April 2014**

**SUMMARY**

Approval is sought for the permanent siting of 6 static caravans to provide seasonal accommodation for workers during the summer months when production at the plant is at its greatest intensity. The caravans have been sited at the site since 2012, it was originally intended to remove the units from the site during the winter however due to adverse weather conditions this has been impossible. Therefore the caravans have remained at the site and this application has been submitted to regularise the situation. Each caravan differs slightly in design however the applicant has confirmed the maximum dimensions of height at 3.2m, width 3.1m and length 11 m.

Six letters of objection have been received from surrounding businesses largely on the grounds that the area is unsuitable for residential use with limited services and facilities it is unsustainable. Concerns are raised that it will increase crime and reduce security at Belasis Park, be detrimental to the character and appearance of the area and it would set an undesirable precedent. These concerns are supported by the Head of the Council's Regeneration and Economic Development section who states that the site is not suitable for residential use and a more sustainable solution would be to buy low cost housing in the local area. However the application as submitted has been assessed in line with the relevant material planning considerations.

In terms of planning policy marketed residential development at this location would not be supported as Belasis Technology Park is safeguarded for employment uses. However the proposed caravans will only provide seasonal accommodation and are therefore considered to be ancillary to the main use at the site. It is important to note that there are permitted development rights for the siting of temporary accommodation in the form of "movable structures" however to be able to benefit from the PD rights for seasonal agricultural accommodation the caravans must be removed from the land once the season is over. Therefore subject to a condition ensuring that the caravans are not occupied between 30th October and 1st April in any one year the principle of the development is considered to be acceptable.

In terms of crime and anti-social behaviour it is noted that the caravans on the site have been in place since 2012. The applicant has confirmed that there have been no complaints received to the site. Furthermore Cleveland Police were consulted on the application and have confirmed that there are no records of any complaints relating to crime and anti-social behaviour in the period from 1st March 2012 to the current date.

The Environmental Health Unit has raised no objections. Therefore taking into account that there are no sensitive users within the vicinity of the application site, such as residential properties, and that there is a large separation distance to other commercial properties it is not considered that the proposal will result in a detrimental impact upon the amenity of neighbouring land users

The Head of Technical Services has raised no objections. As such it is not considered that the proposal will result in an adverse impact upon highway safety.

The proposed development consists of a seasonal accommodation for workers and does not relate to permanent residential use and will largely be screened by the existing buildings on the site. Therefore the proposal is considered to be acceptable in terms of the character and appearance of the surrounding area and it is not considered that it will result in an unacceptable detrimental impact upon the amenity of neighbouring land users. Furthermore it is not considered that the development will result in any adverse impact upon highway safety. Therefore the proposed development is considered to be in accordance with policy CS2, CS3 and CS4 of the adopted Core Strategy and policy IN4 of the Local Plan.

## **RECOMMENDATION**

**That planning application 13/3073/FUL be approved subject to the following conditions and informatives**

**01     *The development hereby approved shall be in accordance with the following approved plan(s);***

<b><i>Plan Reference Number</i></b>	<b><i>Date on Plan</i></b>
<b><i>SBC0004</i></b>	<b><i>20 January 2014</i></b>
<b><i>SBC0003</i></b>	<b><i>6 February 2014</i></b>
<b><i>SBC0001</i></b>	<b><i>6 December 2013</i></b>
<b><i>SBC0002</i></b>	<b><i>6 December 2013</i></b>

***Reason: To define the consent.***

***Conditions which will remain in perpetuity***

**03.     *The development hereby approved shall only provide accommodation for seasonal workers ancillary to the operation of Tees Valley Nursery and shall not be occupied between 30th October and 1st April in any one year.***

***Reason: To ensure the development serves the operational need of the application site and is only occupied seasonally as it is not a suitable location for permanent residential properties.***

## **INFORMATIVE OF REASON FOR PLANNING APPROVAL**

The Local Planning Authority has implemented the requirements of the National Planning Policy Framework.

## **SITE AND SURROUNDINGS**

1. The application site consists of a tomato growing nursery located within Belasis Business Park which is predominantly a commercial and industrial area. The caravans are located adjacent to the existing office building and the commercial greenhouses on the site. Access is gained from a private access track from The Moat. To the north of the site is Cowpen Industrial estate and to the east is open agricultural land. Belasis Business Park is to the south and west of the application site.

## **PROPOSAL**

2. Approval is sought for the permanent siting of 6 static caravans to provide seasonal accommodation for workers during the summer months when production at the plant is at its greatest intensity. The caravans have been sited at the site since 2012. The applicant originally intended to remove the units from the site during the winter however due to adverse weather conditions this has been impossible. Therefore the caravans have remained at the site and this application has been submitted to regularise the situation. Each caravan differs slightly in design however the applicant has confirmed the maximum dimensions of height at 3.2m, width 3.1m and length 11 m.

## **CONSULTATIONS**

3. The following Consultees were notified and comments received are set out below:-

### **Development and Regeneration**

4. Regeneration and Economic Development acknowledges the application for the permanent siting of static caravans for seasonal workers at the North Bank Growers, Tees Valley Nursery site. We appreciate the arrangement has been in place for the previous 2 years and understand that during this period no crime, anti-social behaviour or environmental issues has been reported to the authorities.
5. We do however have reservations and agree with concerns and objections raised by a number of businesses, who are located in close proximity to the site. Primarily we would not want this application to become a precedent in employment land becoming used for residential purposes on the estate. The potential for disruption from residents travelling through the estate to access services in the surrounding area is a particular concern, especially at night times and weekends, which will place additional pressure on the security of the estate and expose properties to potential vandalism and theft. We would suggest that a more sustainable option would be for the applicant to consider purchasing low-cost housing in the local area for their seasonal employees. This would ensure that such employees would access the site, as per the permanent workers, thus reducing the need to provide temporary accommodation.
6. Belasis Business Park is currently in a period of expansion and is one of the three identified Enterprise Zones in the borough. We are working with a number of businesses who are making multi-million investments on the park and would like to ensure that there is no detrimental impact to this continuing.

### **Padi+ Health And Safety Executive**

7. Does not advise against the development on safety grounds.

### **Head of Technical Services**

8. Subject to the comments below the Head of Technical Services raises no objections.

Highways Comments

9. Subject to a condition limiting the use of the caravans in association with the business there are no highway objections.

Landscape & Visual Comments

10. This proposal has no landscape or visual implications.

### **Environmental Health Unit**

11. I have no objection in principal to the development.

### **Northumbrian Water Limited**

12. In making our response Northumbrian Water assess the impact of the proposed development on our assets and assess the capacity within Northumbrian Water's network to accommodate and treat the anticipated flows arising from the development. We do not offer comment on aspects of planning applications that are outside of our area of control.

13. Having assessed the proposed development against the context outlined above I can confirm that at this stage we would have no comments to make.

### **Spatial Plans Manager**

14. . As you will be aware section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that an application for planning permission be determined in accordance with the Development Plan unless the material considerations indicate otherwise.

15. This response focuses on the key spatial planning issues which relate to the application and the draft allocation of the site in the emerging Regeneration and Environment LDD.

#### **SPATIAL PLANNING COMMENTS**

16. The Development Plan overview

17. The development plan currently comprises the

- a. Stockton on Tees Core Strategy LDD (March 2010),
- b. Saved policies of the Stockton-on-Tees Local Plan (1997)
- c. Saved policies of the Local Plan Alteration Number One (2006), and
- d. The Tees Valley Joint Minerals and Waste LDD (September 2011).

18. The following policies are considered to be those of most specific reference

- a. Saved Local Plan policy IN4a identifies the site for business uses
- b. Saved Local Plan policy HO3 criteria based policy for residential development within the limits to development
- c. Core Strategy Policy CS4(2) Economic Regeneration identifies Belasis Technology Park as a main location for general employment
- d. Core Strategy Policy CS4(7) Economic Regeneration protecting viable and attractive employment sites from alternative uses

19. You will also be aware that the Council consulted on the Regeneration and Environment LDD preferred options document in the summer of 2012. This included emerging policy EMP1 which identifies Belasis Business Park for B1(b), B1(c), B2, B8 and other economic development requiring such a location. Emerging policy EMP2 continues to identify that office accommodation, research facilities and light industrial uses will also be supported in this location provided they are linked to the process industries at Billingham, Seal Sands and North Tees. Due to the provisions in paragraph 216 of the NPPF, only limited weight can be attached to these policies.

The National Planning Policy Framework (NPPF)

20. The NPPF is a significant material consideration in the determination of planning applications. Paragraph 14 states that at the heart of the NPPF is the presumption in favour of sustainable development which is a golden thread running through both plan making and decisiontaking. For plan making this includes local planning authorities positively seeking opportunities to meet the development needs of their area. For decision making it means
- a. approving development proposals that accord with the development plan without delay and
  - b. where the development plan is absent, silent or relevant policies are out of date, granting permission unless
  - c. Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole or
  - d. Specific policies in this Framework indicate development should be restricted.

Principle of residential development and loss of employment land

21. Marketed residential development at this location would not be supported as Belasis Technology Park is safeguarded for employment uses. In this regard, residential development of the site is contrary to

Saved Local Plan policy IN4a  
Saved Local Plan policy HO3  
Core Strategy Policy CS4(2)  
Core Strategy Policy CS4(7)

22. However, it is noted that this proposal is not for marketed residential development but for the permanent siting of static caravans for seasonal workers at Tees Valley Nursery as such consideration of this application must have regard to the intended use. The proposal is for 6 caravans and whilst each could accommodate 6 inhabitants it is understood that each caravan will house 4 workers. In total, the proposal will provide accommodation for 24 seasonal workers.
23. You should satisfy yourself that there is an operational need for the proposed caravans and that the scale of the proposal is linked to this operational need. If you are satisfied that an operational need has been established the proposal can be considered ancillary to the employment use at this location. Owing to this and the limited land take of the proposal I do not consider that any objections regarding the loss of employment land are necessary as the proposal will not stifle or impact upon existing or future employment development within the business park.
24. It is suggested that if this application is approved that conditions are applied which restrict the occupancy of the static caravans for their intended use and limits the period of occupancy to the established seasonal period. Further to this it is suggested that a condition be applied which seeks the removal of the caravans if the operational need ceases.
25. In general, residential development would not be supported at this location. However, the proposal if for seasonal workers and subject to you being satisfied that an operational need for the proposal has been justified Spatial Planning do not have any objections.

## **PUBLICITY**

26. Neighbours were notified and comments received are set out below :-

### **27. Mr Matthew Parish**

London Television Centre London

I represent an occupier of Belasis Business Park.

This is an unsuitable location for residential development of any kind due to the absence of facilities (recreational, retail, social etc). This is likely to lead to people hanging around with nothing to do, near office and warehouse premises out of hours (which are therefore vulnerable to crime), and which also may be threatening to individual late workers.

**28. Helen Atkinson**

72 Grosvenor Road Billingham

I object because it is not a residential site. It is setting a precedent. Thought the site was operational all year round so how come they need accommodation for seasonal workers and why can't they rent a house(s) for them.

Will they pay council tax?

Where will the sewage from the caravans go?

In the event of a major incident how will the emergency services know who is on site?

**29. Phusion IM Limited**

16 Earls Nook Billingham

(Summarised)

Object to the proposal on the grounds that the proposal will seriously compromise security, the traffic flow will be increased, the amount of waste generated by the residential use will increase and will attract vermin which will impact upon the wildlife.

The cleanliness, sanitation and upkeep of the area will be detrimentally effected which will be detrimental to business activity of Belasis Business park.

The aesthetics of the business park will be detrimentally affected by the deterioration of permanent siting of caravans (especially when the caravans are not lived in).

The development is likely to impact upon the value of commercial properties.

**30. NEMS Market Research**

23 Manor Way Billingham

NEMS Market Research Ltd would like to OBJECT to this planning application.

The proposed location for the static caravans is unsuitable for a residential development of any kind. The workers at this tomato growing facility are unlikely to be seasonal as the facility grows tomatoes throughout the year.

31. It is incongruous with the mix of businesses located in close proximity which offer no amenity to residents and potentially risks increasing crime in the vicinity - although impossible to prove our business was a victim of burglary in December 2007 when temporary caravans were located on Belasis Avenue.

32. If Tees Valley Nursery feels benevolent then they should provide their workers with proper, permanent housing of which there is no shortage in the residential areas of Billingham.

**33. Paul Messham**

Campbell & Hall Workshop

(Summarised)

Object as we do not want the site to be used by travellers in the future.

**34. HXRUK 3 (NORTH EAST) Ltd**

Highcross Strategic Advisers Limited 2nd Floor The Tower

We do not believe that locating permanent sitting caravans immediately adjacent to a Business Park is an acceptable use and would have a detrimental impact on the scheme as a whole.

Several occupiers have raised their concerns and have indicated they may vacate if planning is granted. Concerns raised, but not limited to, relate to security, traffic flow and general cleanliness around the site with residential waste being located next to the Moat area.

## **PLANNING POLICY**

35. Where an adopted or approved development plan contains relevant policies, Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that an application for planning permissions shall be determined in accordance with the Development Plan(s) for the area, unless material considerations indicate otherwise. In this case the relevant Development Plan is the Core Strategy Development Plan Document and saved policies of the Stockton on Tees Local Plan
36. Section 143 of the Localism Act came into force on the 15 Jan 2012 and requires the Local Planning Authority to take local finance considerations into account, this section s70(2) Town and Country Planning Act 1990 as amended requires in dealing with such an application [planning application] the authority shall have regard to a) the provisions of the development plan, so far as material to the application, b) any local finance considerations, so far as material to the application and c) any other material considerations
37. The following planning policies are considered to be relevant to the consideration of this application:-

### **National Planning Policy Framework**

Paragraph 14. At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking;

For decision-taking this means:

approving development proposals that accord with the development without delay; and where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:

- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or-
- specific policies in this Framework indicate development should be restricted.

### **Core Strategy Policy 2 (CS2) - Sustainable Transport and Travel**

1. Accessibility will be improved and transport choice widened, by ensuring that all new development is well serviced by an attractive choice of transport modes, including public transport, footpaths and cycle routes, fully integrated into existing networks, to provide alternatives to the use of all private vehicles and promote healthier lifestyles.
2. The number of parking spaces provided in new developments will be in accordance with standards set out in the Tees Valley Highway Design Guide.  
Further guidance will be set out in a new Supplementary Planning Document.

### **Core Strategy Policy 3 (CS3) - Sustainable Living and Climate Change**

8. Additionally, in designing new development, proposals will:

- \_ Make a positive contribution to the local area, by protecting and enhancing important environmental assets, biodiversity and geodiversity, responding positively to existing features of natural, historic, archaeological or local character, including hedges and trees, and including the provision of high quality public open space;

- \_ Be designed with safety in mind, incorporating Secure by Design and Park Mark standards, as appropriate;
- \_ Incorporate 'long life and loose fit' buildings, allowing buildings to be adaptable to changing needs. By 2013, all new homes will be built to Lifetime Homes Standards;
- \_ Seek to safeguard the diverse cultural heritage of the Borough, including buildings, features, sites and areas of national importance and local significance. Opportunities will be taken to constructively and imaginatively incorporate heritage assets in redevelopment schemes, employing where appropriate contemporary design solutions.

#### **Core Strategy Policy 4 (CS4) - Economic Regeneration**

1. A range of opportunities will be provided within the employment land portfolio to meet the requirement set out in the Regional Spatial Strategy, as follows:
  - \_ General Employment Land 255 hectares (ha)
  - \_ Key Employment Location (Wynyard) 70 ha
  - \_ Durham Tees Valley Airport 50 ha
  - \_ Land for Chemical and Steel Industries, up to 445 ha
  
2. The main locations for general employment land will be:
  - \_ Durham Lane Industrial Estate. 40 ha
  - \_ Belasis Technology Park 20 ha
  - \_ Teesside Industrial Estate 30 ha
  - \_ Urlay Nook 20 ha
  - \_ Core Area 10 ha
  
3. Land for general employment uses will be released in phases as follows:
  - a. 2004 - 2011 0 ha
  - b. 2011 - 2016 60 ha
  - c. 2016 - 2021 60 ha
  - d. 2021 - 2024 40 ha

#### **Saved Policy IN4 of the adopted Stockton on Tees Local Plan**

On the following sites business uses will be permitted where development incorporates a high standard of design in the layout and detailing of buildings and highways, and includes substantial landscaping:

- (a) Belasis Hall Technology Park, Billingham 54 HA
- (b) Wynyard Estate 72 HA

#### **MATERIAL PLANNING CONSIDERATIONS**

38. The main issues for consideration when assessing this application are the principle of development, amenity of neighbouring land users, character of the surrounding area and highway safety.
  
39. Six letters of objection have been received from surrounding businesses largely on the grounds that the area is unsuitable for residential use with limited services and facilities it is unsustainable. Concerns are raised that it will increase crime and reduce security at Belasis Park, be detrimental to the character and appearance of the area and it would set an undesirable precedent.
  
40. Regeneration & Economic Development has commented that Belasis Business Park is currently in a period of expansion and is one of the three identified Enterprise Zones in the borough. Therefore support is given for the concerns raised by businesses within Belasis Technology Park and do not support setting a precedent in employment land becoming used for residential purposes on the estate. The Head of Regeneration and Economic



development also notes the potential for disruption from residents travelling through the estate to access services in the surrounding area, especially at night times and weekends, which will place additional pressure on the security of the estate and expose properties to potential vandalism and theft.

41. It is suggested that a more sustainable option would be for the applicant to consider purchasing low-cost housing in the local area for their seasonal employees. This is a matter of viability for the applicant to consider. Therefore the current application is considered below on its own material planning consideration.

### **Principle of development**

42. The NPPF is a significant material consideration in the determination of planning applications. Paragraph 14 states that at the heart of the NPPF is the presumption in favour of sustainable development which is a golden thread running through both plan making and decision taking.
43. Marketed residential development at this location would not be supported as Belasis Technology Park is safeguarded for employment uses. In this regard, residential development of the site is contrary to policy IN4a, policy HO3 of the local Plan and Core Strategy policies CS4(2) and CS4(7).
44. However, this proposal is not for marketed residential development but for the permanent siting of static caravans for seasonal workers at Tees Valley Nursery as such consideration of this application must have regard to the intended use. The proposal is for 6 caravans and whilst each could accommodate 6 inhabitants it is understood that each caravan will house 4 workers. In total, the proposal will provide accommodation for 24 seasonal workers. The applicant has confirmed that the level of production during summer months increases significantly and therefore it is considered that there is an operational need for the proposed caravans and that the scale of the proposal is commensurate to scale of the application site overall.
45. Therefore the proposal can be considered ancillary to the employment use at this location. Owing to this and the limited land take of the proposal the Spatial Planning Manager does not raise any objections regarding the loss of employment land as the proposal will not stifle or impact upon existing or future employment development within the business park.
46. It is suggested that if this application is approved that conditions are applied which restrict the occupancy of the static caravans for their intended use and limits the period of occupancy to the established seasonal period. As such a condition is recommended accordingly.
47. There are permitted development rights for the siting of temporary accommodation in the form of "movable structures" however to be able to benefit from the PD rights for seasonal agricultural accommodation the caravans must be removed from the land once the season is over and it should be noted that the Caravan Sites and Control of Development Act 1960 permits workers to be accommodated in caravans on agricultural land even if they are employed to work on agricultural land in the same occupation (not necessarily the land where the caravans are).
48. It has been established that paras 7, 8 of the Caravan Sites and Control of Development Act 1960. Schedule 1 applied in that the stationing of a caravan on agricultural land for purposes incidental to the agricultural use of the land does not constitute the making of a material change in the use of the land and is thus outside development control (*Wealden DC v. Secretary of State for the Environment and Day (Colin)*[1988] J.P.L. 268, CA).

The effect of Para. 7 and Class B of this Part is to grant planning permission for seasonal use of agricultural land as a caravan site for agricultural or forestry workers.

49. A permanent site for a caravan is not authorised under this provision, albeit that it is used for accommodating seasonal agricultural workers: *North v. Brown* (1974) 231 E.G. 737. Nor does the exemption extend to agricultural workers employed throughout the year, as opposed to those engaged temporarily for purposes such as hop-picking: *Vale of White Horse District Council v. Mirmalek-Sani and Mirmalek-Sani*, *The Times*, February 10, 1993.
50. It is noted that there have been caravans on the site for seasonal workers since 2012. Due to adverse weather conditions over the last 2 winters the applicant has had difficulty removing the caravans from the site when they are not in use for seasonal workers (between October and March). Therefore an application has been submitted for permanent retention of the caravans on the site to provide seasonal accommodation. However Taking into account what the permitted development rights allow it is considered reasonable to recommend a condition that the caravans only provide seasonal accommodation. An objector raises concerns that the development is a year round facility however the applicant has confirmed that intensity of production on the site only requires seasonal workers between April and October. Therefore a condition is recommended to ensure that the caravans are not be occupied between 30th October and 1st April in any one year.
51. In light of this the principle of the development, to support the operation of the tomato nursery, is considered to be acceptable in principle subject to the following material planning considerations.

#### **Amenity of neighbouring land users**

52. The caravans are existing on the site and are located to the rear of the main office buildings adjacent to the large greenhouses on the site. The area of land where the caravans are sited is enclosed by a 1.8 metre high closed boarded fence with storage portakabin adjacent to the location of the caravans. As such there is a significant amount of screening for the caravans from existing buildings on the site. Furthermore the caravans are situated approximately 80 metres from the boundary of the overall site. As such it is not considered that they will result in a detrimental impact upon the amenity of neighbouring land users which are commercial and industrial in nature.
53. In terms of crime and anti-social behaviour it is noted that the caravans on the site have been in place since 2012. The applicant has confirmed that there have been no complaints received to the site. Furthermore Cleveland Police were consulted on the application and have confirmed that there are no records of any complaints relating to crime and anti-social behaviour in the period from 1st march 2012 to the current date. There are no hours restrictions imposed upon the current operation of the application site therefore it is not considered that the current application will add undue pressure to security services within Belasis Technology Park during evening hours or weekends.
54. The Environmental Health Unit has raised no objections to the development.

#### **Highway safety**

55. The Head of Technical Services has commented that subject to a condition limiting the use of the caravans in association with the business there are no highway objections. As such it is not considered that the development will result in an adverse impact upon highway safety.

## **Residual Matters**

56. Concerns are raised by objectors with regard to emergency service access for a residential use. The caravans are sited adjacent to the existing office building and HGV turning area which provides sufficient access for emergency vehicles. However this is outside of planning control and cannot be assessed when considering the current application.
57. It is noted that objectors also raise concerns regarding Council Tax payment. The Council tax section has been notified and this matter is being investigated further.
58. Concerns are raised by an objector that the site could be used as a traveller site in the future however this would be subject to a further planning application and any further applications would be considered on its own merits.
59. In terms of setting an undesirable precedent, each application is dealt with on the basis of its own planning merits. Therefore it is not considered that the development would set a precedent for similar development in the future.

## **CONCLUSION**

60. The proposal is considered to be acceptable in terms of the character and appearance of the surrounding area and it is not considered that it will result in an unacceptable detrimental impact upon the amenity of neighbouring land users. Furthermore it is not considered that the development will result in any adverse impact upon highway safety. Therefore the proposed development is considered to be in accordance with policy CS2, CS3 and CS4 of the adopted Core Strategy and policy IN4 of the Local Plan.

**Corporate Director of Development and Neighbourhood Services  
Contact Officer Mrs Helen Heward Telephone No 01642 526063**

## **WARD AND WARD COUNCILLORS**

<b>Ward</b>	<b>Billingham East</b>
<b>Ward Councillor</b>	<b>Councillor M. N. Stoker</b>
<b>Ward</b>	<b>Billingham East</b>
<b>Ward Councillor</b>	<b>Councillor Evaline Cunningham</b>

## **IMPLICATIONS**

**Financial Implications:** As report

**Legal Implications:** As report

**Environmental Implications:** As report

**Human Rights Implications:** The provisions of the European Convention of Human Rights 1950 have been taken into account in the preparation of this report.

**Community Safety Implications:** The provisions of Section 17 of the Crime and Disorder Act 1998 have been taken into account in the preparation of this report.

**Background Papers:** 13/3073/FUL