HUNTINGDONSHIRE DISTRICT COUNCIL

25/00813/FUL

OFFICER REPORT

Case No: **25/00813/FUL** **Full Planning Application**

Proposal: **Change of use from barn to new self build dwelling**

Location: **Barn Two Pole Drove Farcet**

Applicant: **Mr g d'amore**

Grid Ref: **522252 294088**

DESCRIPTION OF SITE AND APPLICATION

The application site is situated on Two Pole Drove to the east of the settlement of Farcet within the open countryside. The site is surrounded by agricultural fields with sporadic agricultural buildings. The site is accessed off Two Pole Drove via an existing secondary access to the site which will become the sole access for the dwelling. The wider site within the ownership of the applicant is currently used for agricultural aggregates storage and distribution.

This application seeks approval for the conversion of an existing barn to a two-bedroom residential dwelling. The barn is currently used for general light storage and is a modern construction cold rolled steel frame supporting a lightweight cladding with an opening to the front. No extensions would be required to convert the building and therefore the proposal would remain within the existing building footprint. The proposal includes various internal and external alterations, such as a new door in place of the existing roller shutter, new window openings and the replacement of the existing cladding with a zinc rolled and seamed roof.

The site is located in Flood Zone 1.

This application has been accompanied by the following:

- Planning Statement;
- Structural Assessment
- Internal photos of building

Officers have scrutinised the plans and have familiarised themselves with the site and surrounding area.

NATIONAL GUIDANCE

The National Planning Policy Framework (NPPF 2024) sets out the three objectives - economic, social and environmental - of the planning system to contribute to the achievement of sustainable development. The NPPF 2024 at paragraph 10 provides as follows: 'So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development (paragraph 11).'

The NPPF 2024 sets out the Government's planning policies for (amongst other things):

* delivering a sufficient supply of homes;
* building a strong, competitive economy;
* achieving well-designed, beautiful and safe places;

* conserving and enhancing the natural, built and historic environment.

Planning Practice Guidance and the National Design Guide 2021 are also relevant and material considerations.

For full details visit the government website: https://www.gov.uk

PLANNING POLICIES

Huntingdonshire's Local Plan to 2036 - adopted May 2019

LP1: Amount of Development
LP2: Strategy for Development
LP4: Contributing to Infrastructure Delivery
LP5: Flood Risk
LP6: Waste Water Management
LP8: Key Service Centres
LP9: Small Settlements
LP10: The Countryside
LP11: Design Context
LP12: Design Implementation
LP14: Amenity
LP15: Surface Water
LP16: Sustainable Travel
LP17: Parking Provision and Vehicle Movement
LP25: Housing Mix
LP30: Biodiversity and Geodiversity
LP31: Trees, Woodland, Hedges and Hedgerows
LP33: Rural Buildings

Local policies are viewable at https://www.huntingdonshire.gov.uk

Supplementary Planning Documents (SPD) and Guidance:

Huntingdonshire Strategic Flood Risk Assessment (2024)
Huntingdonshire Design Guide Supplementary Planning Document 2017
Developer Contributions SPD 2011
Huntingdonshire Landscape and Townscape SPD (2022)
Cambridgeshire Flood and Water SPD 2017
Annual Monitoring Review regarding housing land supply (2024)

The National Design Guide (2021)

* C1 - Understand and relate well to the site, its local and wider context
* I1 - Respond to existing local character and identity
* I2 - Well-designed, high quality and attractive
* B2 - Appropriate building types and forms
*M3 - Well-considered parking, servicing and utilities infrastructure for all users
* N3 - Support rich and varied biodiversity
* H1 - Healthy, comfortable and safe internal and external environment
* H2 - Well-related to external amenity and public spaces
* H3 - Attention to detail: storage, waste, servicing and utilities

Local policies are viewable at https://www.huntingdonshire.gov.uk

RELEVANT PLANNING HISTORY

None

CONSULTATIONS

Farcet Parish Council - Agreed they could not make a decision as there was not sufficient information provided to support the application.

Missing or inadequate information:-
o Structural integrity: No engineer's structural survey has been supplied to demonstrate that the existing steel-portal frame is capable of conversion without substantial rebuilding (Local Plan policy LP 9; NPPF §80-c).
o Flood Risk Assessment: The site lies in Flood Zones 2 & 3 and within 20 m of a fen drainage dyke, yet no Flood Risk Assessment or sequential/exception test accompanies the submission (NPPF §159-168; LP policy LP 5). Finished-floor levels, safe egress routes and surface-water attenuation remain unknown.
o Highway information: Cambridgeshire County Council has commented in principle, but the applicant has not supplied a Construction-Traffic Management Plan, visibility-splay drawings or details of proposed passing-bay surfacing on Two Pole Drove.
o Land contamination: Environmental Health has requested a phased investigation, but no Phase-1 (desktop) study has been provided. The building formerly stored agro-chemicals and may contain asbestos-cement sheeting.
o Biodiversity Net Gain (BNG): The applicant claims exemption on the basis of self-build but has provided no evidence of eligibility under the Environment Act and no metric to demonstrate even a qualitative gain.
o Self-build credentials: No proof has been supplied that the applicant is on the Huntingdonshire Self-Build Register or that the dwelling will be owner-occupied. Bedroom numbers are inconsistent between the application form (three) and the Design & Access Statement (two).
o Design & materials: Samples/colours of cladding, roofing specification, window profiles and an external-lighting scheme are missing. Without these details the Council cannot judge the proposal's impact on the fenland landscape.

Matters of concern awaiting clarification:
o Suitability of an unmade fen drove for year-round domestic and emergency-service access.
o Potential need for a commuted sum towards future maintenance of Two Pole Drove.
o Requirement for dark-sky compliant external lighting to protect rural character.
o Need to remove residential Permitted-Development rights to avoid incremental suburbanisation of the countryside.
o The site has always been designated industrial, not agricultural- no evidence provided that change of use was applied for

Officer Response - a number of the issues raised can be dealt with be condition should permission be granted, however, the comments raised are all considered within the relevant sections of the report below.

Cambridgeshire County Council Highway Authority - No objections to the proposed development, subject to the imposition of conditions on any planning permission granted. Noted that Two Pole Drove is an unmade carriageway that is unlikely to receive any significant highways maintenance. The LPA should consider if this is the correct location for this type of development given the remote nature of the proposal and the type of carriageway surrounding the area.

Huntingdonshire District Council Environmental Health - No objections to the proposed development. The application is for the conversion of an agricultural building to residential use and therefore if minded to approve, recommend conditions ensuring there is no residual contamination from the previous uses.

REPRESENTATIONS

No third-party representations have been received during the course of the application.

SUMMARY OF ISSUES

When determining planning applications, it is necessary to establish what weight should be given to each plan's policies in order to come to a decision. The following legislation, government policy and guidance outline how this should be done.

As set out within the Planning and Compulsory Purchase Act 2004 (Section 38(6)) and the Town and Country Planning Act 1990 (Section 70(2)) in dealing with planning applications the Local Planning Authority shall have regard to have provisions of the development plan, so far as material to the application, and to any other material considerations. This is reiterated within paragraph 48 of the NPPF (2024). The development plan is defined in Section 38(3)(b) of the 2004 Act as "the development plan documents (taken as a whole) that have been adopted or approved in that area".

In Huntingdonshire the Development Plan consists of:

o Huntingdonshire's Local Plan to 2036 (2019)
o Cambridgeshire & Peterborough Minerals and Waste Local Plan (2021)
o Various Neighbourhood Plans

The statutory term 'material considerations' has been broadly construed to include any consideration relevant in the circumstances which bears on the use or development of the land: Cala Homes (South) Ltd v Secretary of State for Communities and Local Government & Anor [2011] EWHC 97 (Admin); [2011] 1 P. & C.R. 22, per Lindblom J. Whilst accepting that the NPPF does not change the statutory status of the Development Plan, paragraph 2 confirms that it is a material consideration and significant weight is given to this in determining applications.

The main issues to consider are:

- The Principle of Development
- Design, Visual Amenity and Impact upon the Character of the area
- Residential Amenity
- Highway Safety, Parking Provision and Access
- Biodiversity
- Flood Risk and Drainage
- Developer Contributions
- Accessible and Adaptable Homes
- Water Efficiency

*The Principle of the Development

The site is located outside of the built-up area of any settlement and is therefore considered to be countryside land in accordance with the Huntingdonshire Local Plan. As such, Policy LP10 (The Countryside) is considered relevant in this instance.

Initially, it is worth noting that the site is approximately 2km south-east of the settlement of Farcet, which the adopted Huntingdonshire Local Plan to 2036 identifies as a small settlement (Policy LP9). The settlement of Farcet provides a range of services and facilities, including a primary school, church, shops and public houses as well as bus stops that regularly travel to and from Peterborough, Yaxley and other neighbouring settlements. As such, it is recognised that any future owner/occupiers of the proposed dwelling would be reliant on the use of private vehicles for the access of day-to-day services and facilities.

Paragraph 78 of the National Planning Policy Framework (NPPF) requires the Council to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against our housing requirement. A substantially revised methodology for calculating local housing need and the reimposition of this as a mandatory approach for establishing housing requirements was introduced on 12th December 2024 in the revised NPPF and associated NPPG (the standard method).

As Huntingdonshire's Local Plan to 2036 is now over 5 years old it is necessary to demonstrate a five-year housing land supply (5YHLS) based on the housing requirement set using the standard method. NPPF paragraph 78 also requires provision of a buffer to ensure choice and competition in the market for land. As Huntingdonshire has successfully exceeded the requirements of the Housing Delivery Test a 5% buffer is required here. The five-year housing land requirement including a 5% buffer is 5,501 homes. The current 5YHLS is 4,430 homes equivalent to 4.03 years' supply.

As a result of this, the presumption in favour of sustainable development is applied for decision taking in accordance with paragraph 11 (d) and footnote 8 of the NPPF in relation to applications involving the provision of housing. This is generally referred to as 'the titled balance'. While no 5YHLS can be demonstrated the Local Plan policies concerned with the supply and location of housing as set out in the Development Strategy chapter (policies LP2, LP7, LP8, LP9 and LP10) of Huntingdonshire's Local Plan to 2036 are considered to be out-of-date and can no longer be afforded full weight in the determination of planning applications. As such, less weight can be attributed to Policy LP10 (though aspects of the policy remain relevant and are assessed in the proceeding sections of this report).

Policy LP10 of the adopted Local Plan states that development in the countryside will be restricted to the limited and specific opportunities as provided for in other policies of the Local Plan. As this application seeks approval for the conversion of an existing barn to a residential dwelling, Policy LP33 (Rural Buildings) of the adopted Local Plan is considered to provide an opportunity for development in this instance.

Policy LP33 of the adopted Local Plan states that a proposal for the conversion of a building in the countryside will be supported where it can be demonstrated that the building is
(i) redundant or disused;
(ii) of permanent and substantial construction;
(iii) not in such a state of dereliction or disrepair that significant reconstruction would be required; and
(iv) structurally capable of being converted for the proposed use.

The submitted Planning Statement notes that the barn subject to this application is currently used for general light storage. However very limited information has been provided to demonstrate that the building in question is either redundant or disused. There is also concern about the validity of the submitted Structural Report as this hasn't been prepared by a qualified professional. Therefore, the application as submitted does not adequately demonstrate that the building is capable of conversion and the Local Planning Authority cannot fully assess that the building in question satisfies criteria (i) to (iv) of Policy LP33 of the adopted Local Plan.

Policy LP33 goes on to state that the conversion would be supported where the proposal
(i) would lead to an enhancement of the immediate setting; and
(ii) any extension or alteration would not adversely affect the form, scale, massing or proportion of the building.

Furthermore, Policy LP33 requires that the proposal would lead to a clear and substantial enhancement of the immediate setting.

As discussed in following sections of this report, the Local Planning Authority are satisfied that the proposal would lead to an enhancement of the immediate setting and the alterations proposed would not adversely affect the building.

Policy LP10 goes on to state that all development in the countryside must
(a) seek to use land of lower agricultural value in preference to land of higher agricultural value;
(b) recognise the intrinsic character and beauty of the countryside; and
(c) not give rise to noise, odour, obtrusive light or other impacts that would adversely affect the use and enjoyment of the countryside by others.

The application site currently comprises of the agricultural barn and area of hard surfacing for the storage of plant and materials, and therefore the proposal would not result in the loss of high value agricultural land. The proposal therefore is in accordance with Policy LP10 criterion (a).

As discussed in the following sections of this report, the Local Planning Authority are satisfied that criterion (b) and (c) are also met.
Overall, while Policy LP33 of the adopted Local Plan provides an opportunity for the conversion of a rural building in the countryside, the Local Planning Authority are not able to satisfy themselves in this instance that the building is suitable for conversion. As such, the principle of development is considered to be unacceptable as the proposal would be contrary to Policies LP10 and LP33 of the adopted Huntingdonshire Local Plan to 2036.

*Design, Visual Amenity and Impact Upon the Character of the Area

Policy LP11 of the Local Plan states that a proposal will be supported where it is demonstrated that it responds positively to its context. Policy LP12 states that new development will be expected to be well designed and that a proposal will be supported where it can be demonstrated that it contributes positively to the area's character and identity and successfully integrates with adjoining buildings and landscape. This is also reflected in the Huntingdonshire Design Guide SPD and Section 12 of the National Planning Policy Framework (2024).

The application site is located in the open countryside and within the character area of the Fens in the HDC Townscape and Landscape SPD (2017). The landscape is primarily characterised by an expansive landscape of flat land below sea level, with long views to distant horizons. The landscape is predominantly used for arable agriculture and given the flat and horizontal nature of the landscape can give vertical features an unusual prominence.

This application seeks approval for the change of use of an existing barn to a two-bedroom dwelling at Two Pole Drove, Farcet. The proposal includes various internal and external alterations, such as a new door in place of the existing roller shutter, new window openings and the replacement of the existing cladding with a zinc rolled and seamed roof.

The proposed alterations to incorporate fenestration are considered to be acceptable and would not result in any visual harm to the existing building or surrounding area. Whilst the outer skin cladding is in relatively good condition, this is to be replaced with a new Zinc standing seam system. The replacement is not considered to affect the visual appearance of the building and would still reflect the countryside and rural location of the site.

As a change to the building footprint is not sought as part of the proposals the building would retain the same scale, mass, height and agricultural appearance. To ensure the building retains its rural character, it is considered to be appropriate and necessary to restrict further development within the site and extensions that could be achieved under householder permitted development rights. An appropriately worded condition will be added to any approval in this regard.

The red line area is drawn relatively close to the existing barn and the proposed change of use would utilise the existing access and an area hardsurfacing whilst also creating a new garden area

and an external patio area. This element of the proposal is considered to improve the current arrangement and would not result in any visual harm. Therefore, the residential curtilage would not extend significantly into the open countryside and would ensure the agricultural practices on adjoining land are not compromised.

Overall, the proposal is considered to be acceptable in terms of its design and appearance. As such, the proposal is deemed to be in accordance with Policies LP10, LP11, LP12 and LP33 of Huntingdonshire's Local Plan to 2036, the Huntingdonshire Design Guide SPD and Section 12 of the National Planning Policy Framework (2024) in this regard.

*Residential Amenity

Policy LP14 of the Local Plan to 2036 states a proposal will be supported where a high standard of amenity is provided for all users and occupiers of the proposed development and maintained for users and occupiers of neighbouring land and buildings.

Policy LP10 part c of the Huntingdonshire Local Plan Policy LP10 'The Countryside' states that development in the countryside should not give rise to noise, odour, obtrusive light or other impacts that would adversely affect the use and enjoyment of the countryside by others.
The barn the subject of this application is relatively isolated in the countryside with the nearest residential dwelling being approximately 350m away. As such, the development is considered acceptable in terms of overshadowing, overlooking, loss of privacy, overbearing impact and loss of light and would not have a significant impact upon the residential amenity of neighbouring properties.

Consideration shall also be given to the residential amenity of the future occupants of the converted barn. The adjacent land uses of the land surrounding the barn is agricultural and the wider site within the ownership of the applicant is currently used for agricultural aggregates storage and distribution which may lead to amenity issues for future residents in terms of dust and noise emanating from the various agricultural practices.

The submitted location plan has a red line area drawn relatively close to the existing barn with hedgerow surrounding the perimeter of the garden area which would help to reduce the potential for land use conflicts and amenity issues between differing land uses to some extent. Furthermore, the proposal would include an appropriate size private amenity space for the future owners/occupiers of the proposed dwelling.

However, the wider site within the ownership of the applicant is currently used for agricultural aggregates storage and distribution and the barn to be converted currently backs directly onto a relatively modern Agricultural/Industrial building which is within the applicant's ownership. The applicant has confirmed that this building is used for storage of plant which is used within the wider yard area. It appears that the use of the wider site will remain following the conversion of the barn, although very little information to this effect has been provided with the application and there would appear to be very little room to access the adjacent storage building given the size and location of the proposed garden area.

If the adjacent use is to be retained there is concern that the noise and disturbance from the building and the associated external area, will adversely affect the residential amenities of the future occupiers of the dwelling and no proposed mitigation has been suggested. The Environmental Health Officer has expressed concern that if the agricultural/construction site continues to operate, this is likely to be unacceptable next to a residential dwelling and garden, however, without sufficient information, it is not possible to fully assess this impact. One suggestion from the Environmental Health Officer would be to require a 1.8m close boarded acoustic fence around the south-west and south-east border adjoining the agricultural/construction site, however, there is concern that this would not be in keeping with the rural character and appearance of the area.

Accordingly, based on the information currently available, the proposed development is considered to be contrary to Policy LP14 of Huntingdonshire's Local Plan to 2036, the Huntingdonshire Design Guide SPD and Section 12 of the National Planning Policy Framework in this regard.

*Highway Safety, Parking Provision and Access

Policies LP16 and LP17 of the Local Plan to 2036 seek to ensure that new development incorporates appropriate space for vehicle movements, facilitates access for emergency vehicles and service vehicles and incorporates adequate parking for vehicles and cycles.
The proposal would utilise an existing secondary vehicular access off Two Pole Drove to serve the proposed conversion. Two Pole Drove is a single lane track which services Palmers Barn and a couple of other barns.

Cambridgeshire County Council have been consulted on this application as the Local Highways Authority. The Highways Officer raised no objection to the proposal from a highway's safety perspective. It is considered that the proposal would not have an adverse impact on highway safety.

The Highway Authority also noted that Two Pole Drove is an unmade carriageway that is unlikely to receive any significant highways maintenance. The LPA should therefore consider if this is the correct location for this type of development given the remote nature of the proposal and the type of carriageway surrounding the area. The Parish Council have also expressed concern regarding the suitability of the access road. However, the access is as existing and it is noted that a similar application for the conversion of a disused barn to residential at Palmers Barn on Two Pole Drove has recently been approved (24/02183/FUL). Accordingly the access arrangements are considered acceptable in this instance.

The proposed two-bedroom dwellinghouse would also include an area for off-street car parking and adequate space for turning to ensure that vehicles enter the highway in a forward gear.

A condition would be imposed on any permission to ensure the provision of secure and covered cycle storage at a rate of one cycle space per bedroom; to accord with Policy LP17 of the Local Plan to 2036 and the Huntingdonshire Design Guide (2017).

Overall, subject to appropriate conditions, the proposal is considered acceptable in terms of its impact on highway safety and therefore accords with Policies LP16 and LP17 of Huntingdonshire's Local Plan to 2036 Policy and Section 9 of the National Planning Policy Framework (2024) in this regard.

*Biodiversity

Paragraph 187 of the NPPF (2024) states planning policies and decisions should contribute to and enhance the natural and local environment. Policy LP30 of the Local Plan to 2036 requires proposals to demonstrate that all potential adverse impacts on biodiversity and geodiversity have been investigated and ensure no net loss in biodiversity and provide a net gain where possible, through the planned retention, enhancement and creation of habitats and wildlife features, appropriate to the scale, type, and location of development.

As the proposal involves the removal of the existing cladding, a Preliminary Ecological Appraisal PEA is required to be submitted in accordance with the Councils Biodiversity checklist. Without the submission of a PEA the Local Planning Authority are not able to satisfy themselves that the proposal would not result in any adverse impacts on biodiversity or geodiversity.

In regard to mandatory Biodiversity Net Gain (BNG), as of the 2nd April 2024 a mandatory 10% Biodiversity Net Gain (BNG) was imposed on small sites. A statement has been submitted within

the application form which states the application falls within the self-build exemption. As the application consists exclusively of a single self-build dwelling on a site which has an area no larger than 0.5 hectares, Officers are satisfied that it is exempt from providing biodiversity net gain under The Biodiversity Gain Requirements (Exemptions) Regulations 2024. A condition to ensure the property would be a self-build property shall be imposed on any permission granted.

However, due to the failure to submit a PEA, the proposal is deemed to be contrary to Policy LP30 of Huntingdonshire's Local Plan to 2036 and Section 15 of the National Planning Policy Framework in this regard and planning permission should be refused in this instance.

*Flood Risk and Drainage

The application site lies within Flood Zone 1 in accordance with Environment Agency mapping and the Huntingdonshire Strategic Flood Risk Assessment (2024).

The flood risk vulnerability of the proposed development is 'more vulnerable' in accordance with the Planning Practice Guidance, which is compatible with land within Flood Zone 1. Furthermore, as stated in paragraph 176 of the National Planning Policy Framework (2024), as the application seeks approval for the change of use and minor development, sequential and exception tests are not required.

The accompanying application form details that foul sewage would be disposed of via a package treatment plant and surface water would be disposed of via soakaways. Given the low flood risk and minor scale of development, officers are satisfied that full details of the surface and foul water drainage could be secured as part of building regulations and other relevant legislative requirements in this instance.

As such, the proposal is considered to be acceptable with regard to its impact on both flood risk and surface water and therefore accords with Policies LP5, LP6 and LP15 of Huntingdonshire's Local Plan to 2036, and Section 14 of the National Planning Policy Framework (2024) in this regard.

*Developer Contributions

Part H of the Developer Contributions SPD (2011) requires a payment towards refuse bins for new residential development. A Unilateral Undertaking Form in respect of wheeled bins has been received by the Local Planning Authority dated 29th July 2025. The proposed development is therefore considered to accord with Policy LP4 of Huntingdonshire's Local Plan to 2036 and the Developers Contributions SPD (2011).

*Accessible and Adaptable Dwellings

Policy LP25 of the Huntingdonshire's Local Plan to 2036 seeks to ensure that all housing developments in the district offers a genuine choice of Accessible and adaptable dwellings that meet the requirements of residents:

f. ensuring 100% of new dwellings, across all tenures provided, meet Building Regulation requirement M4 (2) 'accessible and adaptable dwellings' (or replacement standards).

To ensure that the development can meet these standards a condition would be imposed on any permission that may be granted in this regard in accordance with Policy LP25 of Huntingdonshire's Local Plan to 2036.

*Water Efficiency

Policy LP12 (j) of the Local Plan to 2036 states that new dwellings must comply with the optional Building Regulation requirement for water efficiency set out in Approved Document G of the Building Regulations. A condition will be attached to any consent to ensure compliance with the above, in accordance with Policy LP12 (j) of Huntingdonshire's Local Plan to 2036.

*Other

*Contamination

Given the existing use of the site as an agricultural barn future occupants of the converted barn maybe at risk from residual contamination from the previous use (such as agrochemicals, fertilizers, pesticides, herbicides, fuels, lubricants, buried animal carcasses, areas of waste incineration, asbestos containing materials, etc). As such, Environmental Health were consulted as part of the application. They have raised no objection to the development proposal subject to the imposition of a land contamination condition requiring an assessment of the nature and extent of contamination before development commences.

*Community Infrastructure Levy (CIL)

The development will be CIL liable in accordance with the Council's adopted charging schedule; CIL payments will cover footpaths and access, health, community facilities, libraries and lifelong learning and education.

*Conclusion

Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.

The proposal, by virtue of lack of information, is not able to demonstrate that the barn to be converted is redundant/disused and is structurally capable of being converted for the proposed residential use. It is also considered that insufficient information has been submitted to demonstrate that the proposed development would provide a satisfactory standard of amenity for future owners/occupiers.

Furthermore, the application has not been accompanied by a Preliminary Ecological Appraisal and therefore fails to ensure the conservation and enhancement of biodiversity.

Accordingly the proposal is considered to be contrary to Policies LP10, LP14, LP30 and LP33 of the adopted Huntingdonshire Local Plan to 2036.

Taking national and local planning policies into account, and having regard for all relevant material considerations, it is concluded that the proposed development is contrary to policy and not acceptable. There are no overriding material considerations that indicate that permission should be granted in this instance. Therefore, it is recommended that the application be refused.

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CONTACT OFFICER:
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