SCOTTISH BORDERS COUNCIL

APPLICATION TO BE DETERMINED UNDER POWERS DELEGATED TO CHIEF PLANNING OFFICER

PART III REPORT (INCORPORATING REPORT OF HANDLING)

REF :	18/01000/FUL
APPLICANT :	Ms Louise Weddell
AGENT :	Timber Bush Associates Ltd
DEVELOPMENT :	Erection of dwellinghouse for holiday let
LOCATION:	Land To West Of Warlawbank Steading Reston Eyemouth

TYPE :

FUL Application

REASON FOR DELAY:

DRAWING NUMBERS:

Plan Ref	Plan Type	Plan Status
18/32 - P01 18/32 - P02	Location Plan Proposed Site Plan	Approved Approved
18/32 - P03	Proposed Plans & Sec	ctions Approved

NUMBER OF REPRESENTATIONS: 3 SUMMARY OF REPRESENTATIONS:

CONSULTATIONS

SBC Archaeology Officer: No objection but mitigation required. The steading of Warlawbank dates from at least the 16th century when it appears on Pont's map as 'Horsely'. This suggests that the present 18th or 19th century ruins were preceded by a medieval farmstead. The steading is visible on 19th century historic maps as a typical C-shaped steading with a central cattle court. The ruin to the south is the only surviving building from original building group. There is high potential for encountering further remains of the steading through development, particularly the former northern range of farm buildings. Additionally there is a low to moderate potential for encountering buried remains from earlier medieval and post-medieval phases of occupation.

Beyond the potential for historic archaeology, the development is within a highly sensitive area. A Scheduled hillfort, visible as low earthworks and cropmarks, exists approximately 50 metres to the north-west of the development. Cropmarks in neighbouring fields seem to indicate related prehistoric field systems of route-ways to the fort, and the projection of several linear cropmarks takes them across or very close to the development area. There is therefore a low to moderate potential for encountering buried prehistoric features.

o There is a low to moderate potential for encountering prehistoric or medieval features or deposits

- o There is a high potential for encountering evidence of the 18th/19th century steading
- o The proposed garage is within a ruin of local historic interest.

While I can support development, the archaeological potential noted above requires mitigation per Policy EP8. I note that HES have no objections or comments on impacts to the Scheduled Monument. I recommend that mitigation comes in the form of a watching brief on all excavations associated with the development, including access improvements. I also recommend that Historic Building Appraisal (per ALGAO Scotland guidance) is made of the standing ruin prior to development.

Historic Environment Scotland: We have considered the information received and do not have any comments to make on the proposals. Our decision not to provide comments should not be taken as our support for the proposals. This application should be determined in accordance with national and local policy on development affecting the historic environment, together with related policy guidance.

SBC Contaminated Land Officer: There is an indication within the application that the site has had agricultural use. I therefore recommend that the Applicant complete and return the attached questionnaire providing information relating to the previous use of the site. I recommend that if the questionnaire is not returned, a condition is attached to the Planning Permission in order to ensure that the development is suitable for its proposed use.

SBC Ecology Officer (first response): No objection, but a bat survey was requested prior to determination and a condition was requested to control potential impacts on breeding birds.

SBC Ecology Officer (second response): From the information provided, it appears that the existing walls are to be reduced in height so there is potential for impacts on bats and nesting birds. I am satisfied with the submitted, detailed Preliminary Roost Assessment (Warlawbank Steading, Reston, Bat survey The Wildlife Partnership, April 2019). The built structure had features such as numerous small cracks and crevices which could potentially be used by bats but water ingress from uncapped walls made these features of negligible suitability. The connecting habitat is fragmented and sub-optimal and the location is on an exposed hillside. No further bat surveys are required. The report recommends, on a precautionary basis, that contractors are made aware of the possibility of finding bats. Personnel should be made aware of the appropriate procedure on encountering bats. In this instance, I recommend that an informative is attached to any consent. There is potential for breeding birds to use some of the cracks and crevices identified, although internal voids were wet. I recommend that a Species Protection Plan for birds is required as a Planning condition of any consent. Avoiding the bird breeding season (March-August) to remove part of the wall (reduce wall height) is the most straightforward measure that can be adopted.

SBC Environmental Health: Objection. The proposed development involves the erection of a dwellinghouse in very close proximity to an agricultural building. This building is currently used for the keeping of livestock and can potentially be used for a number of other agricultural activities without the need for planning permission, such as the rearing of pigs. This exposes the development to potential nuisance from such activities relating to noise, odour, dust and insects. Whilst legislation exists in terms of section 79 of the Environmental Protection Act 1990 to protect the public from the impacts of statutory nuisance, I am of the opinion that the existing legislation will not adequately protect residents from loss of amenity. I am therefore unable to support this application and would recommend its refusal.

SBC Environmental Health: Objection removed on the basis of revised proposal.

SBC Roads Planning: No objection but conditions required with respect to the driveway, disposal of surface water, and the provision of a passing place.

Community Council: No response at the time of writing.

Scottish Water: No response at the time of writing.

REPRESENTATIONS

Objections were received from 3 separate members of the public. The issues raised can be summarised below:

- inadequate private water supply capacity at Warlawbank

- hot-tub would affect water capacity

- the current septic tank and soakaway was designed for one residence and lacks capacity for the development

- inadequate access arrangements
- existing parking issues, applicant parks on private land
- existing parking capacity would be affected
- access issues during winter weather
- contamination
- overshadowing
- no bin collection at Warlawbank
- outbuildings are historic and should be retained
- bats are seen daily and a great crested newt was sighted in 2018
- the site is in an area of high archaeological sensitivity
- conflict with working farm, particularly during contstruction
- noise resulting from guests using hot-tub
- amenity issues resulting from proximity to livestock building/ sheep handling facilities
- grass verge area is owned separately and the applicant only has a right of way.

PLANNING CONSIDERATIONS AND POLICIES:

Local Development Plan 2016:

PMD1: Sustainability
PMD2: Quality Standards
ED7: Business, Tourism and Leisure Development in the Countryside
HD2: Housing in the Countryside
HD3: Protection of Residential Amenity
EP1: International Nature Conservation Sites and Protected Species
EP2: National Nature Conservation Sites and Protected Species
EP3: Local Biodiversity
EP8: Archaeology
EP13: Trees, Woodlands and Hedgerows
IS2: Development Contributions
IS7: Parking Provision and Standards
IS9: Waste Water Treatment and SUDS
IS13: Contaminated Land

Other considerations:

Biodiversity Supplementary Planning Guidance 2005 Development Contributions Supplementary Planning Guidance 2011 (Updated 2018) New Housing in the Borders Countryside Supplementary Planning Guidance 2008 Privacy and Amenity Supplementary Planning Guidance 2006 Placemaking and Design Supplementary Planning Guidance 2010

Recommendation by - Paul Duncan (Assistant Planning Officer) on 18th April 2019

BACKGROUND

This application seeks planning permission to erect a dwellinghouse for holiday let at Warlawbank, a cluster of dwellinghouses and farm buildings located on Horsely Hill near Auchencrow.

Planning permission has previously been granted on the same plot for the erection of a dwellinghouse (11/00447/FUL), although that permission has since lapsed. It should be noted that whilst the development proposals title was 'erection of a dwellinghouse' the permission was restricted by condition 4 to the effect that the development could only be used as ancillary accommodation to the applicant's existing dwellinghouse, which is known as Warlawbank Steading. The condition also restricted the sub-division or sale of the development as a separate dwellinghouse.

SITE DESCRIPTION

Warlawbank is located roughly 2km north-west of Auchencrow in East Berwickshire. It is positioned on Horseley Hill, and is accessed via a series of public and private roads that meet the B6437 road close to Sunnyside Farm some 2km to the south-east. There are no listed buildings within the building group. A scheduled historic hill fort is located to the north-west of Warlawbank, beyond a modern farm building that sits close to the site. No other built or natural heritage designations are applicable.

The proposed site currently comprises a vacant yard area enclosed by historic stone walling and the ruins of former buildings. The applicant's dwellinghouse sits to the east. The modern agricultural building to the north-west is not within the applicant's ownership and forms part of the farming operations of a separate party. A further part-hipped stone and slate building which adjoins the aforementioned ruin is also understood to be in separate ownership.

PROPOSED DEVELOPMENT

The proposal is to erect a detached 1.75 storey dwellinghouse for holiday let within the north-west corner of the yard area presently serving the applicant's adjacent dwelling to the east. The house would feature a slated pitched roof with a front elevation gabled projection. The development would share an access with the applicant's existing dwellinghouse. A driveway with parking is shown on the site plan. Further parking is shown within the walls of the ruined building of stone construction to the south of the plot.

ASSESSENT

Principle

There is an established building group of 3 dwellinghouses at Warlawbank and the principle of erecting a detached dwellinghouse on this site has been accepted previously, but the existence of the neighbouring farm building and farm uses was a significant concern which required consideration during the course of the application. As mentioned above, the previous approval was, for this reason, subject to a condition to ensure the house was used as ancillary accommodation to the applicant's house to the east.

Originally, this application was also simply for the erection of a dwellinghouse, but upon encountering the same issues, the applicant was advised that a dwellinghouse could not be supported. The applicant is understood to be keen to find a use for the land in question and following further discussions chose to revise the scope of the application so that the dwellinghouse would be used for holiday let purposes only instead. For reasons of clarity, the title was amended on that basis. The proposals must therefore be assessed against Local Development Plan policy ED7 (Business, Tourism and Leisure Development in the Countryside), but it must be noted that the proposals would satisfy the key aims of rural housing policy HD2. The principle of erecting a dwellinghouse at this location is not a concern for the Planning Authority, it is the amenity of that property which is a concern (this is assessed further below). As the proposals would generally satisfy HD2 there is no risk of sporadic rural housing resulting from this development. It is also noted that, were the business to fail, a suitable alterative use for the building has been accepted previously (i.e., additional accommodation as per the previous approval). The risk of approving this development against policy ED7 is therefore relatively low.

The applicant has put forward a simple business case. It is concluded on the basis of this submission that the erection of a dwellinghouse for holiday let at this location would broadly align with the Borders Tourism Strategy 2013-2020. The development would contribute to the strategy's aims by increasing volume of overnight visitors and increasing overnight visitor spend and by contributing to the range of accommodation available across the region.

It is concluded that in the particular circumstances outlined above, the aims of LDP policy ED7 would be broadly satisfied by these proposals.

Placemaking and Design

Local Development Plan policy PMD2 (Quality Standards) requires all development to be of high quality in accordance with sustainability principles, designed to fit in with Borders townscapes and to integrate with its

landscape surroundings. The policy contains a number of standards that would apply to all development. Placemaking and Design Supplementary Planning Guidance 2010 supplements policy PMD2 and sets out detailed design guidance for developments within the Scottish Borders.

In terms of external appearance, the proposed 1.75 storey slate roofed development remains essentially as per the previous approved scheme. The previously approved cast stone walling is not however considered appropriate in current terms of the latest Placemaking standards and the applicant has agreed to finish the external walls in an unspecified roughcast finish instead. The precise details would be agreed by condition. The scale, massing and materials otherwise remain acceptable.

Residential Amenity

Policy HD3 of the Local Development Plan states that development that is judged to have an adverse impact on the amenity of residential areas will not be permitted. The Council's Supplementary Planning Guidance: Guidance on Householder Developments July 2006 contains guidance on privacy, overlooking and access to light that can be applied when considering planning applications for new household developments to ensure that proposals do not adversely affect the residential amenities of occupants of neighbouring properties. Similar proposals were previously considered acceptable in residential amenity terms and I am satisfied that the development shall not give rise to any unacceptable privacy, loss of light/ sunlight or other residential amenity impacts to neighbouring properties. Objector concerns regarding the proposed hot-tub are noted. Hot-tubs would not normally require planning permission. It would be inappropriate to assume usage would give rise to any unacceptable noise impacts and the use of such equipment would not normally be something the planning system would seek to control.

Amenity issues resulting from proximity to livestock building/ sheep handling facilities were a significant consideration through the handling of this application. The proposals were assessed by Environmental Health who considered the proposed erection of a dwellinghouse for permanent residential use unacceptable in amenity terms. Windows on the rear elevation were also removed to address potential noise and odour impacts. The use of the property for holiday let, for short periods of time, is considered by Environmental Health to be acceptable in amenity terms.

Roads Access and Parking

The development connects to the B6437 public road via a short section of the unclassified D120-6 public road which also serves Horsely Farm, and a lengthier private road up Horsely Hill. The Roads Planning Officer was consulted on the basis of the original proposals but has verbally confirmed that the same standards will be applicable for the revised proposals. There is no objection to the proposals in terms of access, but the formation of a new passing place on the private road has been requested owing to the increased traffic resulting from the development. This can be controlled by condition.

Policy IS7 of the Local Development Plan requires that car parking should be provided in accordance with the Council's adopted standards. The Roads Planning Officer has assessed the proposals and is satisfied that adequate parking and turning can be achieved. Requested conditions relating to parking and the control of surface water, conditions to control both matters have been duly added. Any existing issues involving the parking of vehicles on private land would be a private matter between the interested parties.

Ecology

The Ecology Officer identified potential for impacts on bats and breeding birds. Impacts on breeding birds relate to potential impacts from the downtaking of parts of existing walling. Mitigation for the such works will be controlled by a specifically worded condition. A bat survey was carried out but found no evidence of bats. On a precautionary basis, an informative will be added as the bat survey report and Ecology Officer recommend. Subject to compliance with the aforementioned breeding birds condition, the proposals shall satisfied LDP policies EP1 (International Nature Conservation Sites and Protected Species), EP2 (National Nature Conservation Sites and Protected Species) and EP3 (Local Biodiversity). Informatives relating to environmental law have also been added.

Archaeology

Policy EP8 of the Local Development Plan states that development proposals which will adversely affect local archaeological assets will only be permitted if it can be demonstrated that the benefits of the proposal outweigh the heritage value of the asset. All proposals that adversely affect such an asset must include an acceptable mitigation strategy. The Archaeology Officer has identified three areas which require mitigation. Firstly there is high potential for encountering further remains of the original steading which dates back to the 16th century and which may have been preceded by a medieval farmstead. There is also a low to moderate potential for encountering buried remains from earlier prehistoric, medieval or post-medieval periods. These concerns require mitigation in the form of a watching brief. Finally one of the existing structures is of historic interest and should be recorded via an Historic Building Appraisal (per ALGAO Scotland guidance).

Contaminated Land

Local Development Plan policy IS13 advises that where development is proposed on land that is contaminated or suspected of contamination, appropriate site investigation and mitigation will be required. The Contaminated Land Officer has assessed the history of the site and has identified a potential for contamination on the site relating to the former agricultural use of the site. A questionnaire was sent out so that this could be explored further with the applicant but this was not returned by the applicant. Unusually, the form was however completed and submitted to the department by a former owner or operator of the site, who also, separately, objected to the application. This was not, apparently, submitted on behalf of the applicant. As the questionnaire has not been returned by the applicant and contamination concerns have not been addressed at this time, the requested condition will need to be attached to provide satisfactory control over potential contamination on the site.

Foul and Surface Drainage

Policy IS9 of the Local Development Plan states that the preferred method of dealing with waste water associated with new developments would be the direct connection to the public sewerage system and for development in the countryside the use of private sewerage may be acceptable provided that it can be provided without negative impacts to public health, the environment, watercourses or ground water. A SUDS is required for surface water drainage. Objectors have raised concerns regarding the proposed foul drainage arrangements but the applicant is of the view that there would be sufficient capacity for the proposed development. The applicant should satisfy themselves that this is the case. An informative has been added to this effect. Ultimately these matters would be fully assessed and controlled via the Building Warrant process. A planning condition will also be attached to this approval to ensure that adequate foul drainage arrangements will need to be put in place before occupation. No details have been provided for the handling of surface water. This would be controlled by condition.

Water Supply

Objectors have raised considerable concern with regards to the existing and future supply of water at Warlawbank. These concerns were also raised during the consideration of the previous application. Similarly to the previous application, such matters can be controlled by a fully suspensive planning condition. This would prevent the development being taken forward until evidence that a satisfactory supply of water could be achieved has been provided and agreed with the Planning Authority, in consultation with Environmental Health. An informative will also be added which will confirm that the approval does not indicate that the provision of water supply has been demonstrated.

Other Matters

There is understood to be no bin collection at Warlawbank. This does raise practical issues for the applicant to consider, but would not be a reason for refusing the application.

Private land ownership issues would be a matter for interested parties to address outside the planning process.

REASON FOR DECISION :

Subject to compliance with the schedule of conditions, the development will accord with the relevant provisions of the Local Development Plan 2016 and there are no material considerations that would justify a departure from these provisions.

Recommendation: Approved - conditions & informatives

- 1 The development hereby permitted shall not be carried out otherwise than in complete accordance with the plans and specifications approved by the Planning Authority. Reason: To ensure that the development is carried out in accordance with the approved details.
- 2 The development hereby approved shall be occupied for holiday use only and shall not be used as a person's sole or main residence or as temporary or permanent residential accommodation. The occupation of the holiday units shall be restricted to genuine holidaymakers for individual periods not exceeding 4 weeks in total within any consecutive period of 13 weeks. The operator shall maintain an up-to-date register of the names of all holiday makers staying in the holiday units and their main home addresses. This information shall be made available for inspection at all reasonable times by an authorised officer of the planning authority.

Reason: The accommodation on the site is not designed for permanent occupation and permanent residential use would be contrary to the council's housing in the countryside policies.

- 3 The driveway hereby approved shall have a gradient no greater than 1 in 12 and a minimum length of 5.5m from the back of the footway. The driveway shall be fully operational prior to the occupation of the development hereby approved. Thereafter, parking shall be retained in perpetuity. Reason: To ensure the development is served by appropriate off-street parking.
- Prior to the commencement of development, details of measures within the site for the disposal of surface water to prevent its discharge onto the public road shall be submitted to the Planning Authority for written approval. Thereafter, the measures shall be implemented in full prior to occupation of the development hereby approved. Reason: To ensure that safety of users of the road is not compromised by the influx of uncontrolled surface water.
- 5 Prior to the commencement of development, the location of a new passing place on the private road between Warlawbank and the D120-6 shall be agreed in writing with the Planning Authority. Thereafter, the passing place shall be fully operational prior to the occupation of the development hereby approved.
 Reason: To ensure the existing public road network can cater for the increased traffic flow associated with the development.
- No development shall take place within the development site as outlined in red on the approved plan until the developer has secured a Written Scheme of Investigation (WSI) detailing a programme of archaeological works. The WSI shall be formulated and implemented by a contracted archaeological organisation working to the standards of the Chartered Institute for Archaeologists (CIfA). The WSI shall be submitted by the developer no later than 1 month prior to the start of development works and approved by the Planning Authority before the commencement of any development. Thereafter the developer shall ensure that the programme of archaeological works is fully implemented and that all recording, recovery of archaeological resources within the development site, post-excavation assessment, reporting and dissemination of results are undertaken per the WSI. Reason: The site is within an area where development may damage or destroy archaeological remains, and it is therefore desirable to afford a reasonable opportunity to record the history of the site.
- 7 Unless otherwise agreed in writing and in advance by the Planning Authority, prior to any development commencing on site, a scheme will be submitted by the Developer (at their expense) to identify and assess potential contamination on site. No construction work shall commence until the scheme has been submitted to, and approved, by the Council, and is thereafter implemented in accordance with the scheme so approved.

The scheme shall be undertaken by a competent person or persons in accordance with the advice of relevant authoritative guidance including PAN 33 (2000) and BS10175:2011 or, in the event of these being superseded or supplemented, the most up-to-date version(s) of any subsequent revision(s) of, and/or supplement(s) to, these documents. This scheme should contain details of proposals to investigate and remediate potential contamination and must include:-

a) A desk study and development of a conceptual site model including (where necessary) a detailed site investigation strategy. The desk study and the scope and method of recommended further investigations shall be agreed with the Council prior to addressing parts b, c, d, and, e of this condition.

and thereafter

b) Where required by the desk study, undertaking a detailed investigation of the nature and extent of contamination on site, and assessment of risk such contamination presents.

c) Remedial Strategy (if required) to treat/remove contamination to ensure that the site is fit for its proposed use (this shall include a method statement, programme of works, and proposed validation plan).

d) Submission of a Validation Report (should remedial action be required) by the developer which will validate and verify the completion of works to a satisfaction of the Council.

e) Submission, if necessary, of monitoring statements at periods to be agreed with the Council for such time period as is considered appropriate by the Council.

Written confirmation from the Council, that the scheme has been implemented completed and (if appropriate), monitoring measures are satisfactorily in place, shall be required by the Developer before any development hereby approved commences. Where remedial measures are required as part of the development construction detail, commencement must be agreed in writing with the Council.

Reason: To ensure that the potential risks to human health, the water environment, property, and, ecological systems arising from any identified land contamination have been adequately addressed.

- 8 No works to existing structures shall be undertaken during the breeding bird season (March to August), unless in strict compliance with a Species Protection Plan for breeding birds, including provision for pre-development supplementary survey, that shall be submitted to and approved in writing by the Planning Authority. Reason: To protect the ecological interest in accordance with Local Development Plan policies EP2 and EP3.
- 9 Notwithstanding the description of the materials in the application, no development shall be commenced until precise details of the materials to be used in the construction of the external walls and roofs of the buildings have been submitted to and approved in writing by the Planning Authority, and thereafter no development shall take place except in strict accordance with those details. Reason: The materials require further consideration to ensure a satisfactory form of development, which contributes appropriately to its setting.
- 10 The dwellinghouse hereby approved shall have a natural slate roof. Reason: To ensure the proposed development achieves a suitable visual appearance.
- 11 No development shall commence until a report has been submitted to and approved in writing by the Planning Authority, demonstrating the provision of an adequate water supply to the development in terms of quality and quantity. The report must also detail all mitigation measures to be delivered to secure the quality, quantity and continuity of water supplies to properties in the locality which are served by private water supplies and which may be affected by the development. The provisions of the approved report shall be implemented prior to the occupation of the dwellinghouse hereby approved.

Reason: To ensure that the development is adequately serviced with a sufficient supply of wholesome water and there are no unacceptable impacts upon the amenity of any neighbouring properties.

- 12 No development shall commence until details of foul and surface water drainage have been submitted to and approved in writing by the Planning Authority. Thereafter, the dwellinghouse hereby consented shall not be occupied until the surface water and foul drainage arrangements are functional in accordance with such agreed details. Reason: To ensure that the property is fit for habitation ahead of it being occupied for the first time.
- 13 No development should commence until the applicant has provided evidence that arrangements are in place to ensure that the private drainage system will be maintained in a serviceable condition. Reason: To ensure that the development does not have a detrimental effect on amenity and public health.
- 14 The finished floor levels of the building(s) hereby permitted shall be consistent with those indicated on a scheme of details which shall first have been submitted to and approved in writing by the Planning Authority. Such details shall indicate the existing and proposed levels throughout the application site and shall be measurable from a fixed datum point in a location clearly indicated in the scheme of details so approved.

Reason: To ensure that the proposed development does not have an adverse effect upon the amenity currently enjoyed by adjoining occupiers.

Informatives

It should be noted that:

1 It should be borne in mind that any works carried out within the public road boundary must done by a contractor first approved by the council.

Any gates proposed shall open inward into the property.

- 2 The ALGAO guidance for historic building recording can be found at: www.algao.org.uk/sites/default/files/documents/ALGAO_Scotland_Buildings_Guidance_2013.pdf
- 3 The applicant is reminded that, under the Conservation Regulations (Natural Habitats & c.) 1994 (as amended) it is an offence to deliberately or recklessly damage or destroy a breeding site or resting place of bats (whether or not deliberately or recklessly), capture, injure or kill a bat, harass a bat or group of bats, disturb a bat in a roost (any structure or place it uses for shelter or protection), disturb a bat while it is rearing or otherwise caring for its young, obstruct access to a bat roost or otherwise deny an animal use of a roost, disturb a bat in a manner or in circumstances likely to significantly affect the local distribution or abundance of the species, disturb a bat in a manner or in circumstances likely to impair its ability to survive, breed or reproduce, or rear or otherwise care for its young.

In the event that bats are discovered following the commencement of works, works should stop immediately and the developer must contact SNH (tel: 01896-756652 or 01463 725 364) for further guidance. Works can only recommence by following any guidance given by SNH. The developer and all contractors to be made aware of accepted standard procedures of working with bats at www.bats.org.uk. Further information and articles available at: http://www.bats.org.uk/pages/bats_and_buildings.html http://www.bats.org.uk/pages/existing_buildings.html

http://www.bats.org.uk/publications_download.php/1404/Bats_Trees.pdf

4 The planning permission herbey granted does not convey approval of arrangements for water supply, foul drainage or surface water drainage and in accordance with the related planning condition the Planning Authority will need to be satisfied that these matters can be addressed before development commences.

"Photographs taken in connection with the determination of the application and any other associated documentation form part of the Report of Handling".