



## STAFF REPORT

**TO:** Environment & Planning Subcommittee

**FROM:** Neil Jackson, Policy Planner

**REFERENCE:** T202

**SUBJECT:** **DANGEROUS, EARTHQUAKE-PRONE AND INSANITARY BUILDINGS POLICY: REPORT ON SUBMISSIONS – APRIL 2006 - EP06/05/08** – Report Prepared for Meeting of 10 May 2006

Please refer to your 15 February Environment & Planning Subcommittee agenda – Report EP06/02/10 for the background paper to this report.

### A. PROPOSED AMENDMENTS TO DRAFT POLICY

Proposed amendments 1 – 13 are listed here. The reasons for the amendments are in section C: Analysis of submissions.

1. Add a definition for heritage building:

“Heritage building means:

- Any building within any proposed or confirmed historic place, historic area, wahi tapu, or wahi tapu area registered by the New Zealand Historic Places Trust (NZHPT) under the Historic Places Act 1993; or
- Any building listed as a historic heritage item in the Tasman Resource Management Plan; or
- Any historic building or Actively Managed Historic Place listed in a Historic Resources Strategy or Conservation Management Strategy or Conservation Management Plan prepared under the Conservation Act 1987; or
- Any historic building listed in a reserve management plan prepared under the Reserves Act 1997; or
- Any building within a reserve established by the Mori Land Court under the Te Turi Whenua Maori Land Act 1993 for historic and cultural purposes; or
- Any building of importance to tangata whenua that has been listed in an iwi management plan; or

- Any structures or buildings associated with a historic cemetery or memorial;
- Any building managed for heritage purposes by any agency such as NZHPT, Ministry of Culture and Heritage, Department of Conservation, or the Council; or
- Any building that is subject to a heritage covenant or other protective covenant for heritage purposes; or
- Any other building identified using best practice heritage criteria and research, including buildings identified in national or district heritage inventories or heritage policy.”

2. Consequential amendment:

Amend item 1.3 C. in the earthquake-prone buildings policy, to refer just to “Heritage buildings”.

3: Amendment to the “overall approach”, in relation to heritage buildings.

Add after the sixth paragraph in section 1.2 of the earthquake-prone buildings policy:

“The question of reasonableness also applies to the standard and form of earthquake-proofing required for any heritage building.”

4. Additional consultation in relation to heritage buildings.

Add to section 1.2 after the fifth bullet point:

“Where the building is a heritage building, consult with the relevant agency with an interest in the particular class of heritage building, together with the building owner, over remedial work appropriate to the heritage values of the building.”

5. Add at the end of the first paragraph of section 3.1 of the earthquake-prone buildings policy:

“The Council will ensure that adverse effects to heritage values of buildings are minimised to the greatest practical extent consistent with Council’s responsibility to manage risk associated with earthquake.”

6. Amendment to separate the assessment of earthquake risk, from the assessment of response options.

Amend the second paragraph in 3.1 to:

“The earthquake performance of heritage buildings will be assessed in the same way as for other earthquake-prone buildings. In considering how to manage the risk or improve the performance of earthquake-prone heritage buildings, the retention of heritage values will be a priority factor. Discussions will be held with owners and relevant agencies to identify mutually acceptable ways to address heritage retention and earthquake performance issues.”

7. Clarifying that the requirements are not limited to non-residential buildings, and that the risk assessment is required as a matter of information, not as a criterion for whether a building would be added to TRMP Schedule 18.1A.

Replace the first sentence of the third paragraph under 3.1 with:

“When a building is to be added to Schedule 18.1A in the Tasman Resource Management Plan, an assessment of earthquake risk will be required if that has not already been assessed for the building.”

8. Amend the third paragraph of section 3.1 to end:

: “... procedures required by TRMP rules, the Historic Places Act, or any other statutory provision.”

9. Clarification of timeframe for remedial work for dangerous buildings:

In section 1.5 of the dangerous buildings policy, amend the first clause under the third bullet point to end:

“... within a time stated in the notice being not less than 10 days after the notice is given ...”.

10. Clarifying application of the insanitary buildings policy to DoC facilities that do not have a potable water supply:

Add at the end of section 1.4 of the insanitary buildings policy:

“Backcountry accommodation buildings managed by the Department of Conservation will not be declared insanitary in relation to potable water, provided there is clear signage that meets the Department of Conservation Hut Service Standard indicating that treatment of water is recommended.”

11. Replace section 3 in the dangerous buildings policy with:

“The Council believes it is important that heritage buildings should be safe. However, it does not wish to see the intrinsic heritage values of these buildings adversely affected by structural improvement measures.

A copy of any notice issued under s124 of the Act will be sent to the New Zealand Historic Places Trust, or the relevant agency for the particular category of heritage building, where a heritage building has been identified as a dangerous building.”

12. Retaining consistency with the Act:

Amend clause C of paragraph 2 of the policy for earthquake-prone buildings to:

“Heritage buildings, other than residential buildings of 2 or more storeys containing 3 or more household units.”

13. Alternative provision for heritage buildings, combining section 3 from each part of the policy with the proposed definition of heritage building:

“The following provisions apply to the implementation of all sections of this policy in relation to any heritage building (as defined below).

The Council believes it is important that heritage buildings have a good chance of surviving a major earthquake. It also believes it is important that heritage buildings should be safe. However, the Council does not wish to see the intrinsic heritage values of these buildings adversely affected by structural improvement measures. The Council will ensure that adverse effects to heritage values of buildings are minimised to the greatest practical extent consistent with Council’s responsibility to manage risk associated with earthquake or other aspects of building safety.

The earthquake performance of heritage buildings will be assessed in the same way as for other earthquake-prone buildings. In considering how to manage the risk or improve the performance of earthquake-prone heritage buildings, the retention of heritage values will be a priority factor. Discussions will be held with owners and relevant agencies to identify mutually acceptable ways to address heritage retention and earthquake performance issues.

When a building is to be added to Schedule 18.1A in the Tasman Resource Management Plan, an assessment of earthquake risk will be required if that has not already been assessed for the building.

The issue of any notice requiring earthquake strengthening, or resolving any dangerous or insanitary condition, or demolition, will need to include consideration of any additional procedures required by TRMP rules, the Historic Places Act, or any other statutory provision.”

## **B. CORRECTION**

Before considering the submissions, a correction is required where the section 122 meaning of earthquake-prone building is quoted. “And” should be added between (a) and (b) of subsection (2).

## **C. ANALYSIS OF SUBMISSIONS**

Three submissions were received, from:

New Zealand Historic Places Trust;  
Department of Conservation;  
Council’s Heritage Subcommittee.

The submissions are brief, and are attached to this report.

In addition, the Nelson Branch of the NZ Institute of Architects has indicated it intends to make an oral submission at the Committee hearing. The Institute received a copy of the proposed policy on the day before the submission deadline. The Institute was offered additional time to lodge a written submission, until 28 April.

## New Zealand Historic Places Trust Submission

1. Clause 3 of the policy for earthquake-prone buildings refers to heritage buildings. The Trust asks that “heritage building” be defined. The need for a definition is agreed. The Trust proposes an open-ended definition. The open-endedness may defeat the purpose of having a definition, leading to uncertainty in the absence of any criteria or process to settle any different interpretations.

The definition proposed by the Trust appears to be wide, but each category of building listed is closed. The Trust version refers to dams as well as buildings. Council is required to develop a separate policy on dams, so the proposed definition below refers only to buildings.

Adoption of the definition would require an amendment to item 1.3 C. in the policy, which should then refer just to “Heritage buildings”.

Proposed definition:

“Heritage building means:

- Any building within any proposed or confirmed historic place, historic area, wahi tapu, or wahi tapu area registered by the New Zealand Historic Places Trust (NZHPT) under the Historic Places Act 1993; or
- Any building listed as a historic heritage item in the Tasman Resource Management Plan; or
- Any historic building or Actively Managed Historic Place listed in a Historic Resources Strategy or Conservation Management Strategy or Conservation Management Plan prepared under the Conservation Act 1987; or
- Any historic building listed in a reserve management plan prepared under the Reserves Act 1997; or
- Any building within a reserve established by the Mori Land Court under the Te Turi Whenua Maori Land Act 1993 for historic and cultural purposes; or
- Any building of importance to tangata whenua that has been listed in an iwi management plan; or
- Any structures or buildings associated with a historic cemetery or memorial;
- Any building managed for heritage purposes by any agency such as NZHPT, Ministry of Culture and Heritage, Department of Conservation, or the Council; or
- Any building that is subject to a heritage covenant or other protective covenant for heritage purposes; or

- Any other building identified using best practice heritage criteria and research, including buildings identified in national or district heritage inventories or heritage policy.”
2. Section 1.2 of the policy discusses what is a reasonable level of risk reduction for buildings that are classed as earthquake-prone. The Trust asks that the heritage status of a building be part of the consideration of what is a reasonable standard of improvement.

The policy is required by section 131 of the Building Act. That section specifically requires the policy to state how it will apply to heritage buildings. This is the only category of buildings that section 131 separately identifies. It is reasonable to assume that this specific reference to heritage buildings means they do not need to be treated in the same way as other buildings.

The Trust’s request could be met by adding after the sixth paragraph in section 1.2:

“The question of reasonableness also applies to the standard and form of earthquake-proofing required for any heritage building.”

This amendment would be compatible with section 131 of the Act.

- 2A. The Trust asks to be consulted where heritage buildings require improvement. This proposal should be extended to the other agencies for their respective classes of buildings listed in the proposed definition of heritage buildings. This consultation needs to be conducted in a manner that does not disenfranchise a building owner from decisions being made about their building.

That consultation should occur at the stage of deciding what, if any, remedial work is required. The prior assessment of structural performance should be an objective test by a competent person, not needing consultation with “minder” agencies.

Proposed amendment:

Add to section 1.2 after the fifth bullet point:

“Where the building is a heritage building, consult with the relevant agency with an interest in the particular class of heritage building, together with the building owner, over remedial work appropriate to the heritage values of the building.”

3. Item 3 in the Trust’s submission seems a curious request after previously requesting a definition of heritage buildings, and that heritage status be a factor in considering the reasonableness of strengthening required. The third item is:

“The NZHPT is not in favour of there being a separate “category” for heritage buildings that are identified as being earthquake-prone, as is proposed under 1.3 “identifying earthquake-prone buildings”. This could unduly target such buildings for scrutiny. The consequence could be that hasty and potentially unnecessary alterations to such buildings could ultimately result in the loss of their heritage values, rather than the buildings in fact being protected. Rather, the approach should be one of heritage buildings only being altered where absolutely necessary, and with a great deal of sensitivity. While we appreciate the eagerness of Tasman District Council to ensure the district’s heritage is preserved, earthquake strengthening to heritage buildings should only be undertaken where the building poses serious threat to human safety.”

The Trust appears to regard earthquake-proofing as being the biggest threat to the heritage values of heritage buildings. It appears to overlook the obvious – that the buildings, and their heritage values, are vulnerable to damage or destruction by earthquake. However, the Trust’s emphasis on strengthening only where the building poses serious threat to human safety is in accord with the Act. The section 122 definition of earthquake-prone buildings is not concerned with the failure of the building as an event or risk on its own, but only where that failure includes risk of injury or death to people, or damage to other property.

Elsewhere this submission, and the submission from Council’s Heritage Subcommittee, stress that the purpose of recognising heritage buildings is to assist in protecting and preserving the factors, features, and qualities that make up the historic or heritage value of buildings. The materials used, and the form of construction, may be a significant part of those values.

There is tension between the Building Act concern about safety for people, or risk of damage to other property, and the concern of other legislation for the heritage values of buildings. For example, section 6 of the RMA Act has as a matter of national importance:

“The protection of historic heritage from inappropriate subdivision, use, and development.”

The direction in section 131 of the Building Act to state how the policy will apply to heritage buildings gives an opportunity to attempt to resolve that tension. For this reason it is appropriate for heritage buildings to be separately identified in clause 1.3 C of the policy. It gives an opportunity to consider trade-offs between: total loss of a heritage building through earthquake; possible effect on some aspect of the heritage value of a building through improvement to its structural performance; risk to people using the building; and risk to other property.

The process steps in the policy, for requiring work to be done, include consultation and a right of appeal. These should reduce the risk of hasty or unnecessary alterations to such buildings that the submission refers to– at least under this policy.

4. In item 4, the Trust refers to section 1.5 of the Policy and seeks consultation over the timeframe for heritage buildings. It is not clear whether the Trust is referring to the timeframe by which Council would issue a notice under sections 124 and 125, or the timeframe in which the notice would require any remedial work to be done.

Both timeframes are given in section 2 of the policy. For heritage buildings, the date by which a notice is to be issued is December 2010. The period for completing work required by a notice is 25 years (from the date of the notice).

The Trust may want to clarify what it intended in item 4.

If consultation is still sought, it should be with each relevant agency as in 2A above, not just with the Trust.

5. The Trust seeks flexibility for heritage buildings, from the level of structural improvement required by section 1.5.1 of the policy. The Trust seeks to minimise alterations to heritage buildings to the greatest extent possible.

The draft policy requires earthquake-prone buildings to be strengthened to at least 67% of the standard for new buildings.

Section 131 of the Act implies that the policy need not treat heritage buildings the same as other buildings, so the flexibility sought by the Trust is not incompatible with the Act.

Whether or not a building is classed as earthquake prone is determined by the test in section 122 of the Act. There is no discretion for heritage buildings in that test of structural performance. Discretion can be applied in deciding what is to be done to improve performance, and involves the trade-offs referred to in section 3 of this report:

- total loss of or irreparable damage to a heritage building through earthquake;
- effect on heritage value of a building through improvement to its structural performance;
- risk to people using the building; and
- risk to other property.

The request raises a question of equity. If discretion is to be available for heritage buildings, should it not also be available for other buildings? As the definition of heritage buildings proposed for this policy shows, heritage buildings are recognised in a range of legislation. The legal requirement for the policy also implies that special provision can be made for heritage buildings. Together, these provisions show that heritage buildings have a value to the community that other buildings do not have.

If discretion is to be available for heritage buildings, that will need to be flagged in section 1.5.1 of the policy and addressed further in section 3.



6. The Trust proposes that Council provide funding assistance for strengthening of earthquake-prone buildings.

Improving the earthquake performance of buildings is a function that central government has imposed on local government, with no provision for funding. The costs of improving building performance will fall equally hard on owners of earthquake-prone buildings that are not heritage buildings, and more so if discretion about the required standard of performance is available for heritage buildings but not for others.

At this stage, discretion about the extent and nature of remedial work required is more justifiable for heritage buildings than funding assistance.

The fact that the heritage value of buildings is a “public good”, at the level of being a matter of national under the RMAAct, is acknowledged.

7. The submission suggests the policy include a range of alternatives to avoid unnecessary demolition of heritage buildings. The suggestions, with comment, are:

- restricting public access. This may reduce the heritage value of buildings, if their values cannot be appreciated by the public.
- public warning notices.
- Consultation with owners and the Trust about proposed work notices. Consultation with owners is part of the draft policy. The inclusion of the Trust (or other relevant agency) is proposed in response to item 2A of the submission.
- Extended timeframes. The proposed timeframes are Dec 2010 for Council to issue any notice requiring work to be done, then 25 years for the work to be done. What extension does the Trust consider necessary?
- Ensure any notice provides options for repair. This is within the process and action steps identified in sections 1.2 and 1.5 of the draft policy.
- Examining options for Council to repair buildings under section 126 including considering waiving costs to owners if appropriate. Section 126 gives Council power to carry out required work and recover costs from owners. That power does not need to be repeated in the policy. Waiving such costs is in the same category as funding assistance discussed in section 6 of this report.

Of these alternatives, only the first two are alternative ways to managing the risk of low structural performance. They could be included in any addition to section 3 of the policy to incorporate the discretion discussed in section 5 of this report.

8. Item 8 of the submission says:

“The Policy does not discuss the means of strengthening for heritage buildings. The NZHPT recommends that Tasman District Council take a flexible approach to the ways in which buildings are strengthened ...”

The draft policy does not discuss means of strengthening for any class of building. It is a policy – a statement of intent – not a manual. The policy is flexible in relation to the means of strengthening for any class of building.

The Trust proposes eight matters to be considered. These can be reduced to:

- The heritage values of the building, including its material and construction;
- The physical condition of the building;
- Relevant economic matters;
- Any statutory protection, including any additional approvals required for structural work;
- Advice from any relevant agency or persons competent in either heritage values or structural performance of buildings.

In terms of this policy, reference to the physical condition of the building could be replaced with: “The risk to people or property presented by the current earthquake performance of the building”.

The submission proposes to include: “The principles of the ICOMOS New Zealand Charter”.

ICOMS is the International Council on Monuments and Sites.

The principles in the Charter are aimed at the conservation of places. Their direct relevance to the structural performance of earthquake-prone buildings is questionable. They are included as an appendix to this report, for information.

9. The Trust proposes two amendments to section 3.1 of the draft policy. The first can be accepted with a qualification, and added at the end of the first paragraph:

“The Council will ensure that adverse effects to heritage buildings are minimised to the greatest practical extent consistent with Council’s responsibility to manage risk associated with earthquake.”

The second proposal from the Trust mixes two steps that should be clearly distinguished. The first is the assessment of the structural performance of buildings. This should be an objective test, neutral as to whether a building has heritage value or not.

The second step is determining the extent and form of structural improvement. At this step, the heritage value of a building needs to be taken into account. The second paragraph in 3.1 could be amended to:

“The earthquake performance of heritage buildings will be assessed in the same way as for other earthquake-prone buildings. In considering how to manage the risk or improve the performance of earthquake-prone heritage buildings, the retention of heritage values will be a priority factor. Discussions will be held with owners and relevant agencies to identify mutually acceptable ways to address heritage retention and earthquake performance issues.”

The submission states: “The NZHPT would certainly wish to be consulted over any decision by Council not to schedule a heritage building due to it being considered earthquake-prone.”

The draft policy does not say that an earthquake-prone heritage building would not be added to Schedule 18.1A. It says: “An assessment of earthquake risk will be required for any non-residential building proposed to be added to Schedule 18.1A in the Tasman Resource Management Plan, if the building has not already been assessed.:

The intention is that when a building is added to the Schedule, its earthquake risk should be known – as a matter of information about the condition of the building, not as a criterion for being added to or omitted from the Schedule. The policy statement could be amended to clarify that intent.

It is not clear why this policy statement applies only to non-residential buildings.

An amendment covering both points is to replace the first sentence of the third paragraph under 3.1 with:

“When a building is to be added to Schedule 18.1A in the Tasman Resource Management Plan, an assessment of earthquake risk will be required if that has not already been assessed for the building.”

The end of the paragraph should be amended to: “... procedures required by TRMP rules, the Historic Places Act, or any other statutory provision.”

10. The Trust asks that the definition of heritage building be added to section 3 of the dangerous buildings part of the policy.

An alternative is to state the definition once only, either at the end of the introductory section to the whole policy, or at the end of the policy.

The Trust asks that the 10 working day minimum period of notice for taking action be increased to 20 days for any heritage building that is dangerous. The submission then says: “This could obviously be reduced if the danger was considered to be immediate.”

The period cannot “obviously be reduced” if the policy stipulates 20 days as the minimum, unless it includes a waiver clause and criteria for implementing it. “Danger” implies a degree of immediacy.

The present notice period of a minimum of 10 days overcomes the “obviously be reduced” problem. If the danger does not require immediate resolution, the notice can state a longer period. It could require an immediate action, such as a warning sign or a barricade, and allow a longer period for a structural solution.

The Trust suggests that the Inspection Record form include a question about whether a building is a heritage building.

It also makes a comment about extending the time period in which action would normally be required. The policy does not include a “normal” period for action: it only states that the time cannot be less than 10 days. This clause could be amended to clarify that the 10 days applies after the notice is given:

“... within a time stated in the notice being not less than 10 days after the notice is given ...”.

### **Department of Conservation Submission**

1. The Department’s first concern is that some of its huts and shelters may be classed as insanitary buildings because they lack a potable water supply.

There is sufficient flexibility in the Act’s definition of insanitary building, and in the criteria in section 1.4 of the draft policy for insanitary buildings, to conclude that the DoC buildings are not insanitary in terms of water supply. However, DoC may want some assurance against a maverick decision that declares all its huts in the district to be insanitary. The amendment sought by DoC can be added at the end of section 1.4, with minor modification:

“Backcountry accommodation buildings managed by the Department of Conservation will not be declared insanitary in relation to potable water, provided there is clear signage that meets the Department of Conservation Hut Service Standard indicating that treatment of water is recommended.”

2. The Department manages several buildings for their historical value, although these are not listed in Schedule 18.1A of TRMP. DoC proposes that its list of historic buildings be added to section 3.1 of the earthquake-prone buildings part of the policy.

DoC’s list of buildings fits one of the categories in the definition of heritage buildings proposed by the NZHPT submission:

“Any building managed for heritage purposes by agencies such as NZHPT, Ministry of Culture and Heritage, the Department of Conservation, and local authorities.”

If the Trust’s definition is adopted, the list proposed by the Department is unnecessary.

The specific amendment sought by the Department is covered by the proposed amendment to the second paragraph of section 3.1 of the earthquake-prone buildings policy, discussed under item 9 of the NZHPT submission.

If the definition and the section 3.1 amendment are not adopted, the Department's request will need to be reconsidered.

3. Section 3 of the draft policy for dangerous buildings states:

"No special dispensation will be afforded to heritage buildings under this policy."

The Department requests a provision comparable to the provision for earthquake-prone buildings, commencing with:

"The Council believes it is important that heritage buildings should be safe. However, it does not wish to see the intrinsic heritage values of these buildings adversely affected by structural improvement measures."

The present policy statement appears severe. "No dispensation" implies there is some set level of safety that must be adhered to in all cases. An extreme interpretation would be that any building that does not comply with the current building code is inherently dangerous – with significant implications for heritage buildings.

It is reasonable when a danger has been identified to look at options for achieving safety. For heritage buildings, options that have least effect on the heritage values of the building should be able to be considered.

An adaptation of section 3.1 from the earthquake-prone buildings part of the policy, as amended in response to the submissions, could be added to the dangerous buildings part of the policy.

Alternatively, section 3 could be removed from each part of the policy and, along with the proposed definition of heritage building, be re-stated as a composite policy for heritage buildings, covering earthquake-prone, dangerous, and insanitary conditions.

### **TDC Heritage Subcommittee Submission**

1. The submission from Council's Heritage Subcommittee has two underlying concerns about the draft policy:

- That the policy will be applied with greater weight given to the structural performance of buildings than to their heritage values;
- That the assessment and required structural improvement will create a financial burden for owners of heritage buildings, to the extent that demolition will become a preferred option.

There is potential conflict between:

- The Building Act requirement to improve structural performance in earthquake;
- Principles of protecting historic heritage in the Historic Places Act, RMA Act, Conservation Act and other legislation; and
- The financial ability of owners of heritage buildings.

For heritage buildings, the submission questions whether the policy needs flexibility for Council to consider:

- Earthquake-proofing methods that do not affect heritage values of buildings, and the level of earthquake performance that those methods achieve;
- Earthquake-proofing methods required to meet a nominal target such as the 67% of new building performance, and the effect those methods have on the heritage values of a building;
- Costs – to building owners, Council, or any agency that promotes the heritage values of those buildings.

There is also an issue about the extent to which the material and construction techniques of a building are a feature of its heritage values.

2. The submission seeks funding to assist in the assessment and strengthening of heritage buildings.

See the discussion under item 6 of the NZHPT submission.

3. The Subcommittee is concerned that the requirement for an earthquake risk assessment for any building being added to TRMP Schedule 18.1A will be a deterrent to other buildings being added to the Schedule. The Subcommittee considers there is no connection between the heritage values that make a building suitable for listing in the Schedule, and its earthquake performance.

See discussion under item 9 of the NZHPT submission. In addition, the earthquake risk assessment is required whether a building is in the Schedule or not.

4. The Subcommittee does not favour earthquake-prone buildings carrying a plaque identifying that risk.

Neither the Act nor the draft policy requires a plaque.

The NZHPT submission suggests the use of warning notices as an alternative to remedial work, for heritage buildings. (See item 7 for that submission.) A plaque could be a discreet form of such a notice, if that option was adopted.

- 5 The Subcommittee suggests “specialist recovery management plans” to preserve heritage fabric as well as human life and other property.

These might emerge as experience in managing the structural risks of heritage buildings develops during implementation of the policy.

6. The Subcommittee draws attention to a discrepancy between the exemption provided in the Act, for residential buildings of 2 or more storeys and 3 or more household units, and clause C of paragraph 2 in the draft policy for earthquake-prone buildings.

The policy cannot be inconsistent with the Act. The clause was intended to reflect the Act, not create a different class of exemption. It can be re-written as:

“Heritage buildings, other than residential buildings of 2 or more storeys containing 3 or more household units.”

(Or the exact wording of the Act can be used.)

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